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AIR POLLUTION  
CONTROL PGH

June 25, 2014

Ms. Nicole Weidenbenner  
Air Pollution Control Program  
Missouri Department of Natural Resources  
1659 E. Elm Street  
Jefferson City MO 65101

RE: Part 70 Operating Permit Renewal Application  
Tracker Marine – Lebanon Plant  
Permit No. OP2010-119A  
Installation No. 105-0046

Dear Ms. Weidenbenner:

Environmental Works, Inc. (EWI) is submitting the application above on behalf of the Tracker Marine – Lebanon Plant (Tracker). Please find enclosed two copies of the application and a filing fee of \$100.

The application forms for renewal of the plant's operating permit are enclosed as Attachment A. Changes to the emission units listed in the current permit are identified on Form OP-F01 General Comments. An updated list of emission unit designations is included as Attachment B.

Potential to emit (PTE) was calculated for each emission unit and for the plant as a whole (Attachment C). Installation of the powder coat painting system in 2013 has decreased potential emissions of hazardous air pollutants (HAPs) and volatile organic compounds (VOCs) from liquid coatings significantly. However, a cost/benefit analysis concluded that the facility would be better served by retaining its Part 70 status at this time, especially in view of future growth potential.

Equipment permitted by construction permit 052013-001 is included in the Section D forms. PTE calculations for these units are included in Attachment C, and the units are included in the updated Process Flow Diagram (Attachment D).

Additional equipment was installed during the construction process. A copy of the updates being submitted to MDNR's Construction Permit Unit is included as Attachment E. Emissions from these additional units are below *de minimus* thresholds.

Should you need any further information, please email me at [arode@environmentalworks.com](mailto:arode@environmentalworks.com) or call 417-890-9500.

1455 E. Chestnut Expy  
Springfield, MO 65802  
P: 417.890.9500  
F: 417.823.9659

201 Main Street, Suite 200  
Kansas City, MO 64105  
P: 816.285.8410  
F: 816.285.8409

Environmental Works, Inc.  
Kansas City, MO

24-Hr. 877.827.9500  
[www.environmentalworks.com](http://www.environmentalworks.com)

ED\_006001\_00000527-00001

June 25, 2014

Sincerely,  
ENVIRONMENTAL WORKS, INC.

  
AdriAnn Rode, REM  
Senior Project Manager

C      Dan Hoy, Bass Pro Shops  
         Bobby Baker, Tracker Marine

List of Attachments:

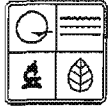
- A – Application for Authority to Operate forms
- B – Emission Unit Designations
- C – Potential to Emit Calculations
- D – Process Flow Diagram
- E – Construction Permit Updates

## **APPENDIX A**

### **Application for Authority to Operate Forms**

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AIR POLLUTION  
CONTROL PROGRAM



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
AIR POLLUTION CONTROL PROGRAM  
**APPLICATION FOR AUTHORITY TO OPERATE**

dk

FOR OFFICE USE ONLY	
FILING FEE	
CHECK NUMBER 055726	CHECK RECEIVED 6-26-14
CHECK AMOUNT \$100.00	CHECK DATE 6-13-14
PROJECT NUMBER 2014-06-070	

**NOTE:** Please read all instructions to assist in completing all forms properly.

**FORM OP-A01 - Section A**

**A01.00 - GENERAL APPLICATION INFORMATION**

All applications MUST be in duplicate and accompanied by a single \$100 filing fee.

1. INSTALLATION NAME Tracker Marine - Lebanon Plant		FIPS 105	PLANT NUMBER 0046	YEAR SUBMITTED 2014
INSTALLATION STREET ADDRESS 1500 Maple Lane			COUNTY NAME Laclede	
CITY Lebanon	STATE MO	ZIP CODE 65536	INSTALLATION TELEPHONE NUMBER WITH AREA CODE 417-588-4181	
INSTALLATION MAILING ADDRESS 2500 E. Kearney Street			INSTALLATION FAX NUMBER WITH AREA CODE 417-873-5451	
CITY Springfield	STATE MO	ZIP CODE 65803	MO SENATORIAL DISTRICT NUMBER 33	
INSTALLATION CONTACT PERSON MR. <input checked="" type="checkbox"/> MS. <input type="checkbox"/> Bobby Baker			MO REPRESENTATIVE DISTRICT NUMBER 146	
CONTACT PERSON TITLE Process Engineer		CONTACT PERSON EMAIL BobbyBakerJr@trackermarine.com		
2. PARENT COMPANY NAME Tracker Marine Group		MAILING ADDRESS 2500 E. Kearney Street		
CITY Springfield	STATE MO	ZIP CODE 65803		
PARENT COMPANY CONTACT PERSON MR. <input checked="" type="checkbox"/> MS. <input type="checkbox"/> Dan Hoy		TELEPHONE NUMBER WITH AREA CODE 417-873-5251		
PARENT COMPANY CONTACT PERSON TITLE Director of Facilities, Bass Pro Shops		CONTACT PERSON EMAIL dhoy@basspro.com		
<b>3. TYPE OF APPLICATION</b>				
<input checked="" type="checkbox"/> PART 70 (MAJOR)				
<input type="checkbox"/> Initial <input type="checkbox"/> Off-Permit Change <input type="checkbox"/> Minor Modification <input checked="" type="checkbox"/> Renewal <input type="checkbox"/> Administrative Amendment <input type="checkbox"/> Significant Modification				
<input type="checkbox"/> INTERMEDIATE STATE				
<input type="checkbox"/> Initial <input type="checkbox"/> Renewal <input type="checkbox"/> Amendment				
<input type="checkbox"/> BASIC STATE				
<input type="checkbox"/> Initial <input type="checkbox"/> Renewal <input type="checkbox"/> Amendment				
<b>4. APPLICANT'S CERTIFICATION STATEMENT</b>				
"I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete."				
SIGNATURE OF RESPONSIBLE OFFICIAL OF COMPANY 			DATE 6/25/14	
TYPE OR PRINT NAME OF RESPONSIBLE OFFICIAL Mr. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dan Hoy			TELEPHONE NUMBER WITH AREA CODE 417-873-5251	
OFFICIAL TITLE OF RESPONSIBLE OFFICIAL Director of Facilities, Bass Pro Shops			RESPONSIBLE OFFICIAL EMAIL dhoy@basspro.com	



**FORM OP-A02 – APPLICATION FOR AUTHORITY TO OPERATE – SECTION A****A02.00 – APPLICATION FOR AUTHORITY TO OPERATE**

INSTALLATION NAME	FIPS	PLANT NUMBER	YEAR SUBMITTED
Tracker Marine - Lebanon Plant	105	0046	2014

**1. LIST THE INSTALLATION'S PRINCIPAL PRODUCT(S)**

PRINCIPAL PRODUCT(S)	TWO-DIGIT SIC CODE
Aluminum Boat Manufacturing	37

**2. LIST ALL OF THE INSTALLATION'S PROCESSES**

PROCESSES	TWO-DIGIT SIC CODE
Gluing/Flotation Foaming	37
Painting	37
Welding	37
Wood Cutting	37

**3. HAS THE INSTALLATION SUBMITTED AN EMISSION INVENTORY QUESTIONNAIRE, OR EIQ, IN THE PAST FIVE YEARS?**YES ☒ NO ☐ If No, submit one copy of a completed EIQ with this application and complete the table below.

If No, indicate the number of each EIQ form submitted with the application.

1.1	Process Flow Diagram	2.3	VOC Process Mass-Balance Worksheet
1.2	Summary of Emission Points	2.4	Petroleum Loading Worksheet
2.0	Emission Point Information	2.5	Organic Liquid Storage-Fixed Roof Tank
2.0C	Control Device Information	2.5L	General Liquid Storage Tank Information
2.0P	Portable Plant Information	2.6	Organic Liquid Storage-Floating Roof Tank
2.0S	Stack Information	2.7	Haul Road Fugitive Emissions Worksheet
2.0Z	Ozone Season Information	2.8	Storage Pile Worksheet
2.1	Fuel Combustion Worksheet	2.9	Stack Test/Continuous Emission Monitoring Worksheet
2.2	Incinerator Worksheet	2.T	Hazardous Air Pollutant Worksheet

**4. INDICATE THE NUMBER OF EACH APPLICATION FORM, LISTED BELOW, INCLUDED WITH THIS APPLICATION**

4	C01.00	Insignificant Activities Required To Be Listed	0	D03.20	Combustion Turbines and Internal Combustion Engines
1	D01.00	Existing Plant-Wide Conditions	0	D03.30	Spray Booths
1	D02.00	Proposed Plant-Wide Conditions	0	D04.00	Alternate Operating Scenario/Voluntary Conditions
13	D03.00	General Emission Unit	4	D05.00	Compliance Determination
1	D03.10	Indirect Heating Sources	2	F01.00	General Comments

FORM OP-B01 – APPLICABLE REQUIREMENTS CHECKLIST – SECTION B				
B01.00 – APPLICABLE REQUIREMENTS CHECKLIST				
INSTALLATION NAME		FIPS	PLANT NO.	YEAR SUBMITTED
Tracker Marine - Lebanon Plant		105	0046	2014
<b>ENTIRE STATE OF MISSOURI</b> (NOTE: ALL INSTALLATIONS MUST SUBMIT FORM OP-B01.00)				
<b>1. STATE ADMINISTRATIVE PERMIT REQUIREMENTS</b>				
APPLICABILITY			TITLE	ORGANIZATION
YES	NO	REASON		
	X	J	10 CSR 10-6.010	Ambient Air Quality Standards <sup>1</sup>
X		J	10 CSR 10-6.020	Definitions and Common Reference Tables <sup>1</sup>
X		J	10 CSR 10-6.030	Sampling Methods for Air Pollution Sources <sup>1</sup>
	X	J	10 CSR 10-6.040	Reference Methods <sup>1</sup>
X		J	10 CSR 10-6.300	Conformity of General Federal Actions to State Implementation Plans <sup>1</sup>
X		J	10 CSR 10-6.320	Sales Tax Exemption <sup>2</sup>
<b>2. CORE PERMIT REQUIREMENTS</b>				
TITLE			ORGANIZATION	
10 CSR 10-6.050			Start-Up, Shutdown, and Malfunction Conditions <sup>1</sup>	
10 CSR 10-6.060			Construction Permits Required <sup>1</sup>	
10 CSR 10-6.065			Operating Permits <sup>1</sup>	
10 CSR 10-6.110			Submission of Emission Data, Emission Fees and Process Information <sup>1</sup>	
10 CSR 10-6.130			Controlling during Episodes of High Air Pollution <sup>1</sup>	
10 CSR 10-6.140			Restrictions of Emissions Credit for Reduced Pollutant Concentrations from the use of Dispersion Techniques <sup>1</sup>	
10 CSR 10-6.150			Circumvention <sup>1</sup>	
10 CSR 10-6.170			Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin <sup>1</sup>	
10 CSR 10-6.180			Measurement of Emissions of Air Contaminants <sup>1</sup>	
10 CSR 10-6.210			Confidential Information <sup>1</sup>	
10 CSR 10-6.230			Administrative Penalties <sup>2</sup>	
10 CSR 10-6.250			Asbestos Abatement Projects-Certification, Accreditation, and Business Exemption Requirements <sup>2</sup>	
10 CSR 10-6.280			Compliance Monitoring Usage <sup>1</sup>	
<b>3. STATE APPLICABLE REQUIREMENTS</b>				
APPLICABILITY			TITLE	ORGANIZATION
YES	NO	REASON		
	X	B	10 CSR 10-6.070	New Source Performance Regulations (NOTE: if yes, check specific subpart on Form OP-BO2.00) <sup>2</sup>
X			10 CSR 10-6.075	Maximum Achievable Control Technology Regulations (NOTE: if yes, check specific subpart Form OP-BO3.00) <sup>2</sup>
X			10 CSR 10-6.080	Emission Standards for Hazardous Air Pollutants (NOTE: if yes, check specific subpart Form OP-BO4.00) <sup>2</sup>
	X	B	10 CSR 10-6.090	Restriction of Emission of Fluorides From Primary Aluminum Reduction Installations <sup>1</sup>
	X	C	10 CSR 10-6.100	Alternate Emission Limits For Ozone Nonattainment Areas <sup>2</sup>
	X	B	10 CSR 10-6.120	Restriction of Emissions of Lead From Specific Lead Smelter-Refinery Installations <sup>1</sup>
	X	B	10 CSR 10-6.200	Hospital, Medical, Infectious Waste Incinerators <sup>1</sup>
X			10 CSR 10-6.220	Restriction of Emission of Visible Air Contaminants <sup>1</sup>
	X	G	10 CSR 10-6.240	Asbestos Abatement Projects—Registration, Notification and Performance Requirements <sup>2</sup>
	X	B	10 CSR 10-6.260	Restriction of Emission of Sulfur Compounds <sup>1</sup>
	X	B	10 CSR 10-6.270	Acid Rain Source Permits Required – If Applicable, Submit Acid Rain Permit Applications to the EPA <sup>2</sup>
	X	B	10 CSR 10-6.310	Restriction of Emissions From Municipal Solid Waste Landfills <sup>1</sup>
	X	B	10 CSR 10-6.330	Restriction of Emissions From Batch-Type Charcoal Kilns <sup>1</sup>
	X	H	10 CSR 10-6.350	Emission Limitations and Emissions Trading of Oxides of Nitrogen <sup>1</sup>
	X	B	10 CSR 10-6.360	Control of NOx Emissions From Electric Generating Units and Non-Electric Generating Boilers <sup>2</sup>
	X	B	10 CSR 10-6.380	Control of NOx Emissions From Portland Cement Kilns
	X	B	10 CSR 10-6.390	Control of NOx Emissions From Large Stationary Internal Combustion Engines
X			10 CSR 10-6.400	Restriction of Emission of Particulate Matter From Industrial Processes <sup>1</sup>
X			10 CSR 10-6.405	Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating
	X	H	10 CSR 10-6.410	Emissions Banking and Trading

<sup>1</sup> Federal, state and local agency enforceable regulation.  
<sup>2</sup> State and local agency enforceable regulation.

**FORM OP-B03 – APPLICABLE REQUIREMENTS CHECKLIST – SECTION B**
**B03.00 – APPLICABLE REQUIREMENTS CHECKLIST**

INSTALLATION NAME Tracker Marine - Lebanon Plant	FIPS 105	PLANT NUMBER 0046	YEAR SUBMITTED 2014
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**MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY REGULATIONS - 10 CSR 10-6.075**

(NOTE: IF CHECKED YES ON FORM OP-B01.00 FOR 10 CSR 10-6.075, PLEASE IDENTIFY THE SPECIFIC SUBPART. IF YOU CHECKED NO, THIS FORM DOES NOT NEED TO BE SUBMITTED. ALL STANDARDS ARE FEDERALLY ENFORCEABLE.)

APPLICABILITY			TITLE SUBPART	ORGANIZATION (40 CFR PART 63 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES)
YES	NO	REASON		
X			A	General Provisions
	X	G	B	Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112(g) and 112(j)
	X	B	F	Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry
	X	B	G	Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater
	X	H	H	Organic Hazardous Air Pollutants for Equipment Leaks
	X	H	I	Organic Hazardous Air Pollutants for Certain Process Subject to the Negotiated Regulation for Equipment Leaks
	X	B	J	Polyvinyl Chloride Copolymers Production
	X	I	K	[Reserved]
	X	B	L	Coke Oven Batteries
	X	B	M	Perchloroethylene Air Emission for Dry Cleaning
	X	B	N	Chromium Emissions from Hard and Decorative Chromium Electroplating and from Chromium Anodizing Tanks
	X	B	O	Ethylene Oxide Emission for Sterilization Facilities
	X	I	P	[Reserved]
	X	H	Q	Hazardous Air Pollutants for Industrial Process Cooling Towers
	X	B	R	Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)
	X	B	S	Hazardous Air Pollutants from the Pulp and Paper Industry
	X	H	T	Halogenated Solvent Cleaning
	X	B	U	Group I Polymers and Resins
	X	I	V	[Reserved]
	X	B	W	Epoxy Resins Production and Non-Nylon Polyamides Production
	X	B	X	Hazardous Air Pollutants from Secondary Lead Smelting
	X	B	Y	National Emission Standards for Marine Vessel Loading and Unloading Operations
	X	I	Z	[Reserved]
	X	B	AA	Hazardous Air Pollutants from Phosphoric Acid Manufacturing Plants
	X	B	BB	Hazardous Air Pollutants from Phosphate Fertilizer Production Plants
	X	B	CC	Hazardous Air Pollutants; Petroleum Refineries
	X	B	DD	Off-Site Waste and Recovery Operations
	X	B	EE	Magnetic Tape Manufacturing Operations
	X	I	FF	[Reserved]
	X	B	GG	National Emissions Standards for Aerospace Manufacturing and Rework Facilities
	X	B	HH	Hazardous Air Pollutants from Oil and Natural Gas Production Facilities
	X	B	II	National Emission Standards for Shipbuilding & Ship Repair (Surface Coating)
	X	B	JJ	National Emission Standards for Wood Furniture Manufacturing Operations
	X	B	KK	National Emission Standard for the Printing and Publishing Industry
	X	B	LL	Hazardous Air Pollutants for Primary Aluminum Reduction Plants
	X	B	MM	Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills
	X	G	OO	Tanks—Level 1
	X	G	PP	Containers
	X	H	QQ	Surface Impoundments
	X	H	RR	Individual Drain Systems
	X	H	SS	Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process
	X	B	TT	Equipment Leaks—Control Level 1
	X	B	UU	Equipment Leaks—Control Level 2 Standards
	X	B	VV	Oil Water Separators and Organic-Water Separators
	X	B	WW	Storage Vessels (Tanks)—Control Level 2
	X	B	XX	Ethylene Manufacturing Process Units: Heat Exchange Systems and Waste Operations

**FORM OP-B03 – APPLICABLE REQUIREMENTS CHECKLIST – SECTION B**
**B03.00 – APPLICABLE REQUIREMENTS CHECKLIST**

INSTALLATION NAME Tracker Marine - Lebanon Plant	FIPS 105	PLANT NUMBER 0046	YEAR SUBMITTED 2014
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**MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY REGULATIONS - 10 CSR 10-6.075**

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APPLICABILITY			TITLE SUBPART	ORGANIZATION (40 CFR PART 63 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES)
	X	B	YY	Hazardous Air Pollutants for Source Categories: Generic Maximum Available Control Technology Standards
	X	I	ZZ	[Reserved]
	X	I	AAA	[Reserved]
	X	I	BBB	[Reserved]
	X	B	CCC	Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants
	X	B	DDD	Hazardous Air Pollutants for Mineral Wool Production
	X	B	EEE	Hazardous Air Pollutants from Hazardous Waste Combustors
	X	I	FFF	[Reserved]
	X	B	GGG	Pharmaceuticals Production
	X	B	HHH	Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities
	X	B	III	Hazardous Air Pollutants for Flexible Polyurethane Foam Production
	X	B	JJJ	Hazardous Air Pollutant Emissions: Group IV Polymers and Resins
	X	I	KKK	[Reserved]
	X	B	LLL	Hazardous Air Pollutants from the Portland Cement Manufacturing Industry
	X	B	MMM	Hazardous Air Pollutants for Pesticide Active Ingredient Production
	X	B	NNN	Hazardous Air Pollutants for Wool Fiberglass Manufacturing
	X	B	OOO	Manufacture of Amino/Phenolic Resins
	X	B	PPP	Hazardous Air Pollutant Emissions for Polyether Polyols Production
	X	B	QQQ	Primary Copper Smelting
	X	B	RRR	Secondary Aluminum Production
	X	I	SSS	[Reserved]
	X	B	TTT	Hazardous Air Pollutants for Primary Lead Smelting
	X	B	UUU	Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units
	X	B	VVV	Hazardous Air Pollutants: Publicly Owned Treatment Works
	X	I	WWW	[Reserved]
	X	B	XXX	Hazardous Air Pollutants for Ferroalloys Production: Ferromanganese and Silicomanganese
	X	B	AAAA	Municipal Solid Waste Landfills
	X	B	CCCC	Manufacturing of Nutritional Yeast
	X	B	DDDD	Plywood and Composite Wood Products
	X	B	EEEE	Organic Liquids Distribution (non-gasoline)
	X	B	FFFF	Miscellaneous Organic Chemical Manufacturing
	X	B	GGGG	Solvent Extractions for Vegetable Oil Production
	X	B	HHHH	Wet Formed Fiberglass Mat Production
	X	B	IIII	Surface Coating of Automobiles and Light Duty Trucks
	X	B	JJJJ	Paper and Other Web Coating
	X	B	KKKK	Surface Coating of Metal Cans
	X	B	MMMM	Surface Coating of Miscellaneous Metal Parts and Products
	X	B	NNNN	Surface Coating of Large Appliances
	X	B	OOOO	Printing, Coating and Dyeing of Fabrics and Other Textiles
	X	B	PPPP	Surface Coating of Plastic Parts and Products
	X	B	QQQQ	Surface Coating of Wood Building Products
	X	B	RRRR	Surface Coating of Metal Furniture
	X	B	SSSS	Surface Coating of Metal Coil
	X	B	TTTT	Leather Finishing Operations
	X	B	UUUU	Cellulose Products Manufacturing
X			VVVV	Boat Manufacturing
	X	B	WWWW	Reinforced Plastic Composites Production
	X	B	XXXX	Rubber Tire Manufacturing
	X	B	YYYY	Stationary Combustion Turbines
	X	B	ZZZZ	Stationary Reciprocating Internal Combustion Engines (RICE)

**FORM OP-B03 – APPLICABLE REQUIREMENTS CHECKLIST – SECTION B**
**B03.00 – APPLICABLE REQUIREMENTS CHECKLIST**

INSTALLATION NAME Tracker Marine - Lebanon Plant	FIPS 105	PLANT NUMBER 0046	YEAR SUBMITTED 2014
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**MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY REGULATIONS - 10 CSR 10-6.075**

(NOTE: IF CHECKED YES ON FORM OP-B01.00 FOR 10 CSR 10-6.075, PLEASE IDENTIFY THE SPECIFIC SUBPART. IF YOU CHECKED NO, THIS FORM DOES NOT NEED TO BE SUBMITTED. ALL STANDARDS ARE FEDERALLY ENFORCEABLE.)

APPLICABILITY			TITLE SUBPART	ORGANIZATION (40 CFR PART 63 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES)
	X	B	AAAAA	Lime Manufacturing Plants
	X	B	BBBBB	Semiconductor Manufacturing
	X	B	CCCCC	Coke Ovens: Pushing, Quenching and Battery Stacks
	X	B	DDDDD	Industrial, Commercial and Institutional Boilers and Process Heaters (This subpart has been vacated by court action)
	X	B	EEEEEE	Iron and Steel Foundries
	X	B	FFFFF	Integrated Iron and Steel Manufacturing Facilities
	X	B	GGGGG	Site Remediation
	X	B	HHHHH	Miscellaneous Coating Manufacturing (MON)
	X	B	IIIII	Mercury Emissions from Mercury Cell Chlor-Alkali Plants
	X	B	JJJJJ	Brick and Structural Clay Products Manufacturing (This subpart has been vacated by court action)
	X	B	KKKKK	Clay Ceramics Manufacturing (This subpart has been vacated by court action)
	X	B	LLLLL	Asphalt Processing and Asphalt Roofing Manufacture
	X	B	MMMMM	Flexible Polyurethane Foam Fabrication Operations
	X	B	NNNNN	Hydrochloric Acid Production
	X	I	OOOOO	[ Reserved ]
	X	B	PPPPP	Engine Test Cells/Stands
	X	B	QQQQQ	Friction Materials Manufacturing
	X	B	RRRRR	Taconite Iron Ore Processing
	X	B	SSSSS	Refractory Products Manufacturing
	X	B	TTTTT	Primary Magnesium Refining
	X	I	UUUUU	[ Reserved ]
	X	I	VVVVV	[ Reserved ]
	X	B	WWWWW	Hospital Ethylene Oxide Sterilizers
	X	I	XXXXX	[ Reserved ]
	X	B	YYYYY	Area Sources: Electric Arc Furnace Steelmaking Facilities
	X	B	ZZZZZ	Iron and Steel Foundries Area Sources
	X	I	AAAAAA	[ Reserved ]
	X	B	BBBBBB	Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
	X	B	CCCCCC	Source Category: Gasoline Dispensing Facilities
	X	B	DDDDDD	Polyvinyl Chloride and Copolymers Production Area Sources
	X	B	EEEEEE	Primary Copper Smelting Area Sources
	X	B	FFFFFF	Secondary Copper Smelting Area Sources
	X	B	GGGGGG	Primary Nonferrous Metals Area Sources—Zinc, Cadmium, and Beryllium
	X	B	HHHHHH	Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
	X	I	IIIIII	[ Reserved ]
	X	I	JJJJJJ	[ Reserved ]
	X	I	KKKKKK	[ Reserved ]
	X	B	LLLLLL	Acrylic and Modacrylic Fibers Production Area Sources
	X	B	MMMMMM	Carbon Black Production Area Sources
	X	B	NNNNNN	Chemical Manufacturing Area Sources: Chromium Compounds
	X	B	OOOOOO	Flexible Polyurethane Foam Production and Fabrication Area Sources
	X	B	PPPPPP	Lead Acid Battery Manufacturing Area Sources
	X	B	QQQQQQ	Wood Preserving Area Sources
	X	B	RRRRRR	Clay Ceramics Manufacturing Area Sources
	X	B	SSSSSS	Glass Manufacturing Area Sources
	X	B	TTTTTT	Secondary Nonferrous Metals Processing Area Sources
	X	I	UUUUUU	[ Reserved ]
	X	B	VVVVVV	Chemical Manufacturing Area Sources
	X	B	WWWWWW	Area Source Standards for Plating and Polishing Operations
	X	B	XXXXXX	Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

**FORM OP-B03 – APPLICABLE REQUIREMENTS CHECKLIST – SECTION B****B03.00 – APPLICABLE REQUIREMENTS CHECKLIST**

INSTALLATION NAME Tracker Marine - Lebanon Plant	FIPS 105	PLANT NUMBER 0046	YEAR SUBMITTED 2014
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**MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY REGULATIONS - 10 CSR 10-6.075**

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APPLICABILITY			TITLE SUBPART	ORGANIZATION (40 CFR PART 63 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES)
	X	B	YYYYYY	Ferroalloys Production Facilities
	X	B	ZZZZZZ	Aluminum, Copper, and Other Nonferrous Foundries
	X	B	AAAAAAA	Asphalt Processing and Asphalt Roofing Manufacturing
	X	B	BBBBBBB	Chemical Preparations Industry
	X	B	CCCCCCC	Paints and Allied Products Manufacturing
	X	B	DDDDDDD	Area Source Standards for Prepared Feeds Manufacturing
	X	B	EEEEEEE	Gold Mine Ore Processing and Production Area Source Category

780-1519 (08-12)

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**FORM OP-B04 – APPLICABLE REQUIREMENTS CHECKLIST – SECTION B**
**B04.00 – APPLICABLE REQUIREMENTS CHECKLIST**

INSTALLATION NAME	FIPS	PLANT NO.	YEAR SUBMITTED
Tracker Marine - Lebanon Plant	105	0046	2014

**EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS - 10CSR 10-6.080**

(NOTE: If checked yes on Form OP-B01.00 for 10 CSR 10-6.080, please identify the specific subpart. If checked no, this form does not need to be submitted. All standards are federally enforceable.)

APPLICABILITY			TITLE SUBPART	ORGANIZATION (40 CFR PART 61 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS)
YES	NO	REASON		
X			A	General Provisions
	X	B	B	Radon Emissions from Underground Uranium Mines
	X	B	C	Beryllium
	X	B	D	Beryllium Rocket Motor Firing
	X	B	E	Mercury
	X	B	F	Vinyl Chloride
	X	I	G	[Reserved]
	X	B	H	Emissions of Radionuclides Other Than Radon From Department of Energy Facilities
	X	B	I	Radionuclides Emissions from Federal Facilities Other Than Nuclear Regulatory Commission Licensees and Not Covered by Subpart H
	X	B	J	Equipment Leaks (Fugitive Emission Sources) of Benzene
	X	B	K	Radionuclide Emission from Elemental Phosphorous Plants
	X	B	L	Benzene Emissions from Coke By-Products Recovery Plants
X			M	Asbestos
	X	B	N	Inorganic Arsenic Emissions from Glass Manufacturing Plants
	X	B	O	Inorganic Arsenic Emissions from Primary Copper Smelters
	X	B	P	Inorganic Arsenic Emissions from Arsenic Trioxide and Metallic Arsenic Production Facilities
	X	B	Q	Radon Emissions from Department of Energy Facilities
	X	B	R	Radon Emissions from Phosphogypsum
	X	I	S	[Reserved]
	X	B	T	Radon Emissions from the Disposal of Uranium Mill Tailings
	X	I	U	[Reserved]
	X	B	V	Equipment Leaks (Fugitive Emission Sources)
	X	B	W	Radon Emissions from Operating Mill Tailings
	X	I	X	[Reserved]
	X	B	Y	Benzene Emissions from Benzene Storage Vessels
	X	I	Z	[Reserved]
	X	I	AA	[Reserved]
	X	B	BB	Benzene Emissions from Benzene Transfer Operations
	X	I	CC	[Reserved]
	X	I	DD	[Reserved]
	X	I	EE	[Reserved]
	X	B	FF	Benzene Waste Operations

**FORM OP-B07 – APPLICABLE REQUIREMENTS CHECKLIST – SECTION B****B07.00 – APPLICABLE REQUIREMENTS CHECKLIST**

INSTALLATION NAME	FIPS	PLANT NUMBER	YEAR SUBMITTED
Tracker Marine - Lebanon Plant	105	0046	2014

**OUTSTATE MISSOURI AREA**

(NOTE: PLEASE INCLUDE FORM OP-B07.00 ONLY IF **NOT** LOCATED AT FOLLOWING LOCATIONS: CITY OF ST. LOUIS, JEFFERSON, FRANKLIN, ST. CHARLES, CLAY, CASS, BUCHANAN, RAY, JACKSON, PLATTE, AND GREENE COUNTIES)

**1. CORE REQUIREMENTS**

TITLE	ORGANIZATION
10 CSR 10-3.030	Open Burning Restrictions <sup>1</sup>
10 CSR 10-3.090	Restrictions of Emission of Odors <sup>2</sup>

**2. APPLICABLE REQUIREMENTS**

APPLICABILITY			TITLE	ORGANIZATION
YES	NO	REASON		
	X	H	10 CSR 10-3.010	Auto Exhaust Emission Controls <sup>1</sup>
	X	B	10 CSR 10-3.160	Restriction of Emission of Fluorides From Diammonium Phosphate Fertilizer Production <sup>1</sup>

<sup>1</sup> Federal, state and local agency enforceable regulation

<sup>2</sup> State and local agency enforceable regulation



**FORM OP-C01 – INSIGNIFICANT ACTIVITIES REQUIRED TO BE LISTED – SECTION C****C01.00 – INSIGNIFICANT ACTIVITIES**

NOTE: For Part 70 applications only.

INSTALLATION NAME	FIPS	PLANT NUMBER	YEAR SUBMITTED
Tracker Marine - Lebanon Plant	105	0046	2014

INSIGNIFICANT ACTIVITY		POTENTIAL ESTIMATED EMISSIONS (TONS/YR)						
EMISSION UNIT ID		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-06A								
DESCRIPTION								
Gasoline Storage Tank - Working Loss		0	0	0	0	0	0	0
EMISSION UNIT ID		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-06B								
DESCRIPTION								
Gasoline Storage Tank - Breathing Loss		0	0	0	0	0	0	0
EMISSION UNIT ID		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-07A								
DESCRIPTION								
Diesel Storage Tank - Working Loss		0	0	0	0	0	0	0
EMISSION UNIT ID		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-07B								
DESCRIPTION								
Diesel Storage Tank - Breathing Loss		0	0	0	0	0	0	0
EMISSION UNIT ID		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-08A								
DESCRIPTION								
Welding - Wire Usage		1	0	0	0	0	0	0
EMISSION UNIT ID		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-08B								
DESCRIPTION								
Welding - Rod Usage		0	0	0	0	0	0	0

DUPLICATE THIS FORM AS NEEDED

**FORM OP-C01 – INSIGNIFICANT ACTIVITIES REQUIRED TO BE LISTED – SECTION C****C01.00 – INSIGNIFICANT ACTIVITIES**

NOTE: For Part 70 applications only.

INSTALLATION NAME

Tracker Marine - Lebanon Plant

FIPS

105

PLANT NUMBER

0046

YEAR SUBMITTED

2014

INSIGNIFICANT ACTIVITY		POTENTIAL ESTIMATED EMISSIONS (TONS/YR)						
EMISSION UNIT ID EP-11(1)		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
DESCRIPTION  Plasma Cutter (875.2 in./boat)		0	0	0	0	0	0	0
EMISSION UNIT ID EP-11(2)		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
DESCRIPTION  Plasma Cutter (6,255 in./boat)		0	0	0	0	0	0	0
EMISSION UNIT ID EP-11(3)		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
DESCRIPTION  Plasma Cutter (3,700 in./boat)		0	0	0	0	0	0	0
EMISSION UNIT ID EP-11(4)		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
DESCRIPTION  Plasma Cutter (3,700 in./boat)		0	0	0	0	0	0	0
EMISSION UNIT ID EP-11(5)		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
DESCRIPTION  Plasma Cutter (2,400 in./boat)		0	0	0	0	0	0	0
EMISSION UNIT ID EP-11(6)		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
DESCRIPTION  Plasma Cutter (3,700 in./boat)		0	0	0	0	0	0	0
DUPLICATE THIS FORM AS NEEDED								

**FORM OP-C01 – INSIGNIFICANT ACTIVITIES REQUIRED TO BE LISTED – SECTION C****C01.00 – INSIGNIFICANT ACTIVITIES**

NOTE: For Part 70 applications only.

INSTALLATION NAME	FIPS	PLANT NUMBER	YEAR SUBMITTED
Tracker Marine - Lebanon Plant	105	0046	2014

INSIGNIFICANT ACTIVITY		POTENTIAL ESTIMATED EMISSIONS (TONS/YR)						
EMISSION UNIT ID		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-12(3)								
DESCRIPTION								
Drying Oven for Paint Booth EP-10(3)		0	0	1	0	1	0	0
EMISSION UNIT ID		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-13								
DESCRIPTION								
Flotation Foaming		0	0	0	0	0	0	0
EMISSION UNIT ID		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-15								
DESCRIPTION								
Acid Wash System		0	0	0	0	0	0	0
EMISSION UNIT ID		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-16								
DESCRIPTION								
Dry-Off Oven		0	0	1	0	1	0	0
EMISSION UNIT ID		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-17, EP-19, EP-21								
DESCRIPTION								
Powder coating booths #1, #2, & Clear		1	0	0	0	0	0	0
EMISSION UNIT ID		PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-18, EP-20								
DESCRIPTION								
Infrared Ovens #1 & #2		0	0	1	0	1	0	0

DUPLICATE THIS FORM AS NEEDED

**FORM OP-C01 – INSIGNIFICANT ACTIVITIES REQUIRED TO BE LISTED – SECTION C****C01.00 – INSIGNIFICANT ACTIVITIES**

NOTE: For Part 70 applications only.

INSTALLATION NAME

Tracker Marine - Lebanon Plant

FIPS

105

PLANT NUMBER

0046

YEAR SUBMITTED

2014

INSIGNIFICANT ACTIVITY	POTENTIAL ESTIMATED EMISSIONS (TONS/YR)						
EMISSION UNIT ID	PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-22							
DESCRIPTION							
Powder Coat Cure Oven	0	0	1	0	1	0	0
EMISSION UNIT ID	PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-25							
DESCRIPTION							
Infrared Space Heaters							
EMISSION UNIT ID	PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-26							
DESCRIPTION							
Burn-Off Oven	0	0	0	0	0	0	0
EMISSION UNIT ID	PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
EP-28							
DESCRIPTION							
Convection Oven	0	0	1	0	1	0	0
EMISSION UNIT ID	PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
DESCRIPTION							
EMISSION UNIT ID	PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO	LEAD	HAPS
DESCRIPTION							

DUPLICATE THIS FORM AS NEEDED

**FORM OP-D01 – EXISTING PLANT-WIDE CONDITIONS – SECTION D****D01.00 – EXISTING PLANT-WIDE CONDITIONS**

NOTE: Include a blank form when no existing plant-wide conditions are applicable.

INSTALLATION NAME	FIPS	PLANT NUMBER	YEAR SUBMITTED
Tracker Marine - Lebanon Plant	105	0046	2014

Please list in the space provided below any permit conditions which are currently applicable on a plant wide basis: (e.g., Production is limited to 10,000 units per 12 month rolling average, or a limit on the installation's hours of operation)

PERMIT NO.	APPLICABLE PERMIT CONDITION	
OP2010-119A	PW001 Emission Limitations (EL): 1. Emit less than 250 tons of VOCs in any consecutive 12-month period.	
	EL 2. Calculate potential emissions of VOCs when considering using alternative materials in the paint booths.	
	(see Form OP-F01 General Comments)	
	PW001 Operational Limitation (OL): 1. Keep solvent and cleaning solutions in sealed containers when not in use.	
	OL 2. When paint booths EP-10(3) or EP-10(4) are operating, control PM10 using filters as specified. (see	
	Form OP-F01 General Comments)	
	OL 3. When paint booth EP-10(1) is operating, control PM10 using filters as specified. (see Form OP-F01)	
	PW002 EL 1. Use carpet and fabric adhesives that contain no more than 5% (wt.) organic HAP.	
	EL 2.a) Comply with separate or combined emission limits for wipedown solvents and surface coatings	
	based on 12-month rolling averages calculated each month.	
	EL 2.b) Comply with work practice standards for cleaning coating spray guns using solvents containing > 5%	
	organic HAP by weight.	
PERMIT NO.	COMPLIANCE DEMONSTRATION METHOD	DESCRIBE METHOD AND GIVE REFERENCE
OP2010-119A	Recordkeeping	PW001 EL 1. Maintain Excel workbook of monthly emissions & 12-month totals.
	PTE calculations	PW001 EL 2. Calculate potential emissions prior to using alternative materials.
	Recordkeeping	PW001 OL 1. Inspect solvent and cleaning containers monthly.
	Recordkeeping	PW001 OL 2. Maintain log of filter media maintenance for EP-10(3).
	N/A	PW001 OL 3. N/A
	Recordkeeping	PW002 EL 1. Document organic HAP percentage of adhesives.
	Recordkeeping	PW002 EL 2.a) Maintain Excel workbook of calculations each month with
		12-month rolling averages to comply with specified limits.
	N/A	PW002 EL 2.b) Such solvents not used.

**DUPLICATE THIS FORM AS NEEDED**

## D02.00 – PROPOSED PLANT-WIDE CONDITIONS

INSTALLATION NAME

FIPS

PLANT NO.

YEAR SUBMITTED
----------------

## Tracker Marine - Lebanon Plant

105

0046

2014

Please list in the space provided below any proposed permit conditions that the installation intends to establish in this operating permit.

### PROPOSED CONDITION

N/A

Please describe what methodologies you intend to use to demonstrate compliance with each of the proposed plant-wide condition(s) that are being established above: (e.g., testing, monitoring and record keeping)

[illegible]

**DUPLICATE THIS FORM AS NEEDED**

**FORM OP-D03 – EMISSION UNIT INFORMATION – SECTION D****D03.00 – GENERAL EMISSION UNITS**

INSTALLATION NAME Tracker Marine - Lebanon Plant	FIPS 105	PLANT NUMBER 0046	YEAR SUBMITTED 2014
EMISSION UNIT ID EP-11(5)	EQ REFERENCE NUMBER EP-11(5)	SOURCE CLASSIFICATION CODE 30903008	

**1. EMISSION UNIT DESCRIPTION**

INSTALLATION'S NAME FOR THIS EMISSION UNIT

Plasma Cutter - 2,400 inches/boat

DESCRIPTION OF EMISSION UNIT

Plasma Cutter

MANUFACTURER

C&amp;G Systems Corporation

MODEL NUMBER/SERIAL NUMBER

Crossfire II

CONSTRUCTION DATE

June 2013

MAXIMUM HOURLY DESIGN RATE

7,200 inches cut per hour

STACK NO.

S-1U

TEMPERATURE

°F

FLOW RATE

8,000

Ft<sup>3</sup>/min**2. ASSOCIATED AIR POLLUTION CONTROL EQUIPMENT**

CONTROL DEVICE TYPE Robovent Filtration System	POLLUTANT(S) CONTROLLED Particulate Matter	CONTROL EFFICIENCY 99.9 %	CAPTURE EFFICIENCY %
ADDITIONAL CONTROL DEVICE TYPE	POLLUTANT(S) CONTROLLED	CONTROL EFFICIENCY %	CAPTURE EFFICIENCY %

**3. APPLICABLE REQUIREMENTS**

POLLUTANT	APPLICABLE REQUIREMENT AUTHORITY (CSR#, CFR#, PERMIT NO., ETC.)	EMISSION LIMIT OR STANDARD (INCLUDING UNITS)
Particulate Matter	10 CSR 10-6.400	PM Emissions < 2.90 lbs/hr
Particulate Matter	10 CSR 10-6.220	Opacity < 20%

DUPLICATE THIS FORM AS NEEDED



















**FORM OP-D03 – EMISSION UNIT INFORMATION – SECTION D****D03.00 – GENERAL EMISSION UNITS**

INSTALLATION NAME Tracker Marine - Lebanon Plant	FIPS 105	PLANT NUMBER 0046	YEAR SUBMITTED 2014
EMISSION UNIT ID EP-23	EQ REFERENCE NUMBER EP-23	SOURCE CLASSIFICATION CODE 10200603	

**1. EMISSION UNIT DESCRIPTION**

INSTALLATION'S NAME FOR THIS EMISSION UNIT

Make-up Air Units

DESCRIPTION OF EMISSION UNIT

Natural gas-fired make-up air units - 4 total

MANUFACTURER

Rupp Air Management Systems (new Make-up Air Units #1, #2)

MODEL NUMBER/SERIAL NUMBER

RAM 30

CONSTRUCTION DATE

June 2013

MAXIMUM HOURLY DESIGN RATE

6.6 MMBTU/hr (3.3 MMBTU/hr each for the two new units)

STACK NO.

N/A

TEMPERATURE

°F

FLOW RATE

Ft<sup>3</sup>/min**2. ASSOCIATED AIR POLLUTION CONTROL EQUIPMENT**

CONTROL DEVICE TYPE

Uncontrolled

POLLUTANT(S) CONTROLLED

CONTROL EFFICIENCY

%

CAPTURE EFFICIENCY

%

ADDITIONAL CONTROL DEVICE TYPE

POLLUTANT(S) CONTROLLED

CONTROL EFFICIENCY

%

CAPTURE EFFICIENCY

%

**3. APPLICABLE REQUIREMENTS**

POLLUTANT	APPLICABLE REQUIREMENT AUTHORITY (CSR#, CFR#, PERMIT NO., ETC.)	EMISSION LIMIT OR STANDARD (INCLUDING UNITS)
Combustion Emissions	Exempt per 10 CSR 10-6.061(3)(A)1.A.	N/A

DUPLICATE THIS FORM AS NEEDED











<b>FORM OP-D05 – COMPLIANCE DETERMINATION METHODS – SECTION D</b>			
<b>D05.00 – COMPLIANCE DETERMINATION</b>			
INSTALLATION NAME Tracker Marine - Lebanon Plant	FIPS 105	PLANT NO. 0046	YEAR SUBMITTED 2014
EMISSION UNIT ID EP-11(5)	EQ REFERENCE NUMBER (ID) EP-11(5)	SOURCE CLASSIFICATION CODE (SCC) 30903008	
<b>1. APPLICABLE REQUIREMENT</b>			
APPLICABLE REQUIREMENT 10 CSR 10-6.400		POLLUTANT(S) Particulate Matter	
EMISSION LIMITATION OR STANDARD PM Emissions < 2.90 lbs/hr			
<b>2. TESTING</b>			
DATE		TEST METHOD	
SUMMARY OF RESULTS			
<b>3. MONITORING</b>			
PARAMETER MONITORED		MONITORING METHOD	
MONITORING SCHEDULE			
<b>4. RECORD KEEPING</b>			
PARAMETER RECORDED		RECORD KEEPING METHOD	
RECORD KEEPING SCHEDULE			
<b>5. REPORTING</b>			
REPORTING REQUIREMENT 10 CSR 10-6.110 Submission of Emission Data		REPORTING SCHEDULE Annual	
<b>DUPLICATE THIS FORM AS NEEDED</b>			

<b>FORM OP-D05 – COMPLIANCE DETERMINATION METHODS – SECTION D</b>			
<b>D05.00 – COMPLIANCE DETERMINATION</b>			
INSTALLATION NAME Tracker Marine - Lebanon Plant		FIPS 105	PLANT NO. 0046
		YEAR SUBMITTED 2014	
EMISSION UNIT ID EP-11(5)	EIQ REFERENCE NUMBER (ID) EP-11(5)		SOURCE CLASSIFICATION CODE (SCC) 30903008
<b>1. APPLICABLE REQUIREMENT</b>			
APPLICABLE REQUIREMENT 10 CSR 10-6.220		POLLUTANT(S) Particulate Matter	
EMISSION LIMITATION OR STANDARD Opacity < 20%			
<b>2. TESTING</b>			
DATE		TEST METHOD	
SUMMARY OF RESULTS			
<b>3. MONITORING</b>			
PARAMETER MONITORED Visible Air Contaminants		MONITORING METHOD US EPA Test Method 22	
MONITORING SCHEDULE Weekly for 8 consecutive weeks; then if no violations: Once every two weeks for 8 weeks; then if no violations: Once per month. Return to once a week if any violation noted. If opacity standard exceeded, conduct Method 9 observation.			
<b>4. RECORD KEEPING</b>			
PARAMETER RECORDED Visible Air Contaminants		RECORD KEEPING METHOD Opacity Emission Observations Log (Attachment B of current permit)	
RECORD KEEPING SCHEDULE Maintain records of Method 22 observations. Maintain records of equipment malfunctions. Maintain records of Method 9 observations.			
<b>5. REPORTING</b>			
REPORTING REQUIREMENT Semiannual Title V Monitoring Report; Annual Compliance Certification		REPORTING SCHEDULE Semiannually on April 1, October 1 Annually on April 1	
<b>DUPLICATE THIS FORM AS NEEDED</b>			

<b>FORM OP-D05 – COMPLIANCE DETERMINATION METHODS – SECTION D</b>			
<b>D05.00 – COMPLIANCE DETERMINATION</b>			
INSTALLATION NAME Tracker Marine - Lebanon Plant		FIPS 105	PLANT NO. 0046
		YEAR SUBMITTED 2014	
EMISSION UNIT ID EP-11(6)	EQ REFERENCE NUMBER (ID) EP-11(6)		SOURCE CLASSIFICATION CODE (SCC) 30903008
<b>1. APPLICABLE REQUIREMENT</b>			
APPLICABLE REQUIREMENT 10 CSR 10-6.400		POLLUTANT(S) Particulate Matter	
EMISSION LIMITATION OR STANDARD PM Emissions < 4.45 lbs/hr			
<b>2. TESTING</b>			
DATE		TEST METHOD	
SUMMARY OF RESULTS			
<b>3. MONITORING</b>			
PARAMETER MONITORED		MONITORING METHOD	
MONITORING SCHEDULE			
<b>4. RECORD KEEPING</b>			
PARAMETER RECORDED		RECORD KEEPING METHOD	
RECORD KEEPING SCHEDULE			
<b>5. REPORTING</b>			
REPORTING REQUIREMENT 10 CSR 10-6.110 Submission of Emission Data		REPORTING SCHEDULE Annual	
<b>DUPLICATE THIS FORM AS NEEDED</b>			

FORM OP-D05 – COMPLIANCE DETERMINATION METHODS – SECTION D			
D05.00 – COMPLIANCE DETERMINATION			
INSTALLATION NAME		FIPS	PLANT NO.
Tracker Marine - Lebanon Plant		105	0046
YEAR SUBMITTED			
2014			
EMISSION UNIT ID		EQ REFERENCE NUMBER (ID)	SOURCE CLASSIFICATION CODE (SCC)
EP-11(6)		EP-11(6)	30903008
<b>1. APPLICABLE REQUIREMENT</b>			
APPLICABLE REQUIREMENT		POLLUTANT(S)	
10 CSR 10-6.220		Particulate Matter	
EMISSION LIMITATION OR STANDARD			
Opacity < 20%			
<b>2. TESTING</b>			
DATE		TEST METHOD	
SUMMARY OF RESULTS			
<b>3. MONITORING</b>			
PARAMETER MONITORED		MONITORING METHOD	
Visible Air Contaminants		US EPA Test Method 22	
MONITORING SCHEDULE			
Weekly for 8 consecutive weeks; then if no violations: Once every two weeks for 8 weeks; then if no violations: Once per month. Return to once a week if any violation noted. If opacity standard exceeded, conduct Method 9 observation.			
<b>4. RECORD KEEPING</b>			
PARAMETER RECORDED		RECORD KEEPING METHOD	
Visible Air Contaminants		Opacity Emission Observations Log (Attachment B of current permit)	
RECORD KEEPING SCHEDULE			
Maintain records of Method 22 observations. Maintain records of equipment malfunctions. Maintain records of Method 9 observations.			
<b>5. REPORTING</b>			
REPORTING REQUIREMENT		REPORTING SCHEDULE	
Semiannual Title V Monitoring Report; Annual Compliance Certification		Semiannually on April 1, October 1 Annually on April 1	
<b>DUPLICATE THIS FORM AS NEEDED</b>			



**FORM OP-D06 – CORE PERMIT REQUIREMENTS – SECTION D****D06.00 – CORE PERMIT REQUIREMENTS (NOTE: THIS IS A REQUIRED FORM FOR ALL PERMIT APPLICATIONS)**

INSTALLATION NAME	FIPS	PLANT NO.	YEAR SUBMITTED
Tracker Marine - Lebanon Plant	105	0046	2014

NOTE: The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the code of federal regulations and code of state regulations for the full text of the applicable requirements.

**10 CSR 10-6.050, Start-up, Shutdown and Malfunction Conditions**

- (a) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days in writing the following information:
- (1) Name and location of installation.
  - (2) Name and telephone number of person responsible for the installation.
  - (3) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - (4) Identity of the equipment causing the excess emissions.
  - (5) Time and duration of the period of excess emissions.
  - (6) Cause of the excess emissions.
  - (7) Air pollutants involved.
  - (8) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude.
  - (9) Measures taken to mitigate the extent and duration of the excess emissions.
  - (10) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- (b) The permittee shall submit the paragraph (a.) information list to the director in writing at least 10 days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given 10 days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within 10 working days.
- (c) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph (a.) list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- (d) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- (e) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

**10 CSR 10-6.060, Construction Permits Required**

The permittee shall not commence construction, modification or major modification of any installation subject to this rule; begin operation after that construction, modification or major modification; or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

**10 CSR 10-6.065, Operating Permits**

The permittee shall file for renewal of this operating permit no sooner than eighteen months, nor later than six months, prior to the expiration date of this operating permit. The permittee shall retain the most current operating permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

**10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants****40 CFR Part 61 Subpart M, National Emission Standard for Asbestos**

- (a) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- (b) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

**FORM OP-D06 – CORE PERMIT REQUIREMENTS – SECTION D****D06.00 – CORE PERMIT REQUIREMENTS (CONTINUED) (THIS IS A REQUIRED FORM FOR ALL PERMIT APPLICATIONS)**

INSTALLATION NAME	FIPS	PLANT NO.	YEAR SUBMITTED
Tracker Marine - Lebanon Plant	105	0046	2014

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the code of federal regulations and code of state regulations for the full text of the applicable requirements.

**10 CSR 10-6.100, Alternate Emission Limits**

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

**10 CSR 10-6.110, Submission of Emission Data, Emission Fees and Process Information**

- The permittee shall complete and submit an Emission Inventory Questionnaire, or EIQ, in accordance with the requirements outlined in this rule.
- The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the EIQ form or equivalent approved by the director.

**10 CSR 10-6.130, Controlling Emissions During Episodes of High Air Pollution Potential**

This rule specifies the conditions that establish an air pollution alert (yellow/red), watch or emergency and the associated procedures and emissions reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the director.

**10 CSR 10-6.150, Circumvention**

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

**10 CSR 10-6.170, Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

- The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line or origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary.

**10 CSR 10-6.180, Measurement of Emissions of Air Contaminants**

- The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

**10 CSR 10-6.250, Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements**

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the department's Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the department's Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

**FORM OP-D06 – CORE PERMIT REQUIREMENTS – SECTION D****D06.00 – CORE PERMIT REQUIREMENTS (CONTINUED) (THIS IS A REQUIRED FORM FOR ALL PERMIT APPLICATIONS)**

INSTALLATION NAME	FIPS	PLANT NO.	YEAR SUBMITTED
Tracker Marine - Lebanon Plant	105	0046	2014

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the code of federal regulations and code of state regulations for the full text of the applicable requirements.

**Yes No Regulation** (Please check the appropriate response regarding applicability)

- |   |   |   |
|---|---|---|
| ✓ | ✓ | 10 CSR 10-2.070 (Kansas City Metropolitan Area) |
| ✓ |   | 10 CSR 10-3.090 (Outstate Area)                 |
|   | ✓ | 10 CSR 10-4.070 (Greene County)                 |

**Restriction of Emission of Odors**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of 1 hour.

**This requirement is not federally enforceable.**

**10 CSR 10-5.160, (Not Applicable if not in St. Louis Metropolitan Area) Restriction of Emission of Odors**

~~No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:~~

- ~~(a) Residential, recreational, institutional, retail sales, hotel or educational premises.~~
- ~~(b) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or~~
- ~~(c) Premises other than those in paragraphs (1)A.1. and (2) of the rule when air containing odorous matter is diluted with four or more volumes of odor-free air.~~

~~The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30 percent or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75 percent of those exposed if fewer than 20 people are exposed.~~

~~**This requirement is not federally enforceable.**~~

**10 CSR 10-6.280, Compliance Monitoring Usage**

- (a) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - (1) Monitoring methods outlined in 40 CFR Part 64.
  - (2) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit.
  - (3) Any other monitoring methods approved by the director.
- (b) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
  - (1) Monitoring methods outlined in 40 CFR Part 64.
  - (2) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit.
  - (3) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- (c) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - (1) Applicable monitoring or testing methods, cited in:
    - 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - 10 CSR 10-6.040, "Reference Methods";
    - 10 CSR 10-6.070, "New Source Performance Standards";
    - 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants".
  - (2) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

**FORM OP-D06 – CORE PERMIT REQUIREMENTS – SECTION D****D06.00 – CORE PERMIT REQUIREMENTS (CONTINUED) (THIS IS A REQUIRED FORM FOR ALL PERMIT APPLICATIONS)**

INSTALLATION NAME	FIPS	PLANT NO.	YEAR SUBMITTED
Tracker Marine - Lebanon Plant	105	0046	2014

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the code of federal regulations and code of state regulations for the full text of the applicable requirements.

**10 CSR 10-5.040, (Delete if not in St. Louis Metropolitan Area) Use of Fuel in Hand-Fired Equipment Prohibited**

It shall be unlawful to operate any hand-fired fuel burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood burning fireplaces and wood burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

**Yes No Regulation** (Please check the appropriate response regarding applicability)

- |                                     |                                     |   |
|-------------------------------------|-------------------------------------|---|
|                                     | <input checked="" type="checkbox"/> | 10 CSR 10-2.100 (Kansas City Metropolitan Area) |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | 10 CSR 10-3.030 (Outstate Area)                 |
|                                     | <input checked="" type="checkbox"/> | 10 CSR 10-4.090 (Greene County)                 |
|                                     | <input checked="" type="checkbox"/> | 10 CSR 10-5.070 (St. Louis Metropolitan Area)   |

**Open Burning Restrictions**

- The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
  - The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known.
  - The schedule of burning operations.
  - The exact location where open burning will be used to dispose of the trade wastes.;
  - Reasons why no method other than open burning is feasible.
  - Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt the installation from the provisions of any other law, ordinance or regulation.
- The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

**St. Louis City Ordinance 64749, Sec 17, (Not Applicable if not in City Limits of St. Louis City) Open Burning Restrictions**

- ~~No person shall cause, suffer, allow or permit the open burning of refuse.~~
- ~~No person shall conduct, cause or permit the conduct of a salvage operation by open burning.~~
- ~~No person shall conduct, cause or permit the disposal of trade waste by open burning.~~
- ~~No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.~~
- ~~It shall be prima facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.~~

**10 CSR 10-5.240, (Not Applicable if not in St. Louis Metropolitan Area) Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area**

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
- Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour."

**FORM OP-D06 – CORE PERMIT REQUIREMENTS – SECTION D****D06.00 – CORE PERMIT REQUIREMENTS (CONTINUED) (THIS IS A REQUIRED FORM FOR ALL PERMIT APPLICATIONS)**

INSTALLATION NAME	FIPS	PLANT NO.	YEAR SUBMITTED
Tracker Marine - Lebanon Plant	105	0046	2014

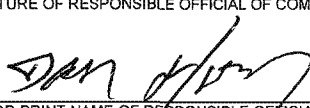
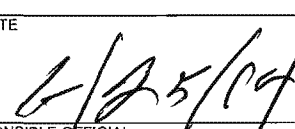
The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the code of federal regulations and code of state regulations for the full text of the applicable requirements.

**Title VI – 40 CFR Part 82, Protection of Stratospheric Ozone**

- (a) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
- (1) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - (2) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - (3) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - (4) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- (b) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR part 82, Subpart F, except as provided for motor vehicle air conditioners, or MVACs, in Subpart B:
- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - (3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - (5) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- (c) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- (d) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner, the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

*Federal Only - 40 CFR part 82*

FORM OP-E01 – COMPLIANCE PLAN/STATUS – SECTION E			
E01.00 – COMPLIANCE PLAN/STATUS			
INSTALLATION NAME Tracker Marine - Lebanon Plant	FIPS 105	PLANT NO. 0046	YEAR SUBMITTED 2014
Completion of this form of the operating permit forms package is mandatory for all sources. Complete this form once for each application.			
<b>1. COMPLIANCE STATUS WITH ALL APPLICABLE REQUIREMENTS EFFECTIVE AT THE TIME OF THE ISSUANCE OF THIS PERMIT.</b>			
WILL YOUR INSTALLATION BE IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF THE PERMIT ISSUANCE AND CONTINUE TO COMPLY WITH THESE REQUIREMENTS FOR THE DURATION OF THE PERMIT?			
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> (IF NO, COMPLETE A COMPLIANCE PLAN AS DESCRIBED IN THE INSTRUCTIONS ON FORM OP-F01.00)			
<b>2. COMPLIANCE STATUS WITH ALL APPLICABLE REQUIREMENTS EFFECTIVE DURING THE PERMIT TERM.</b>			
WILL YOUR INSTALLATION BE IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS TAKING EFFECT DURING THE TERM OF THE PERMIT?			
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> (IF NO, COMPLETE A COMPLIANCE PLAN AS DESCRIBED IN THE INSTRUCTIONS ON FORM OP-F01.00)			
<b>3. COMPLIANCE STATUS WITH ENHANCED MONITORING AND COMPLIANCE CERTIFICATION.</b>			
IS THE INSTALLATION IDENTIFIED IN THIS APPLICATION IN COMPLIANCE WITH ALL APPLICABLE ENHANCED MONITORING AND COMPLIANCE CERTIFICATION REQUIREMENTS?			
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> (IF NO, COMPLETE A COMPLIANCE PLAN AS DESCRIBED IN THE INSTRUCTIONS ON FORM OP-F01.00)			
<b>4. SCHEDULE OF SUBMISSION OF COMPLIANCE CERTIFICATION DURING THE PERMIT TERM.</b>			
FREQUENCY OF SUBMITTALS Annual		BEGINNING DATE 04/01/2015	
<b>5. CERTIFICATION STATEMENT FOR PART 70 MINOR PERMIT MODIFICATIONS.</b>			
I hereby certify that this request for a permit modification meets the criteria described in 10 CSR 10-6.065(5)(e)5.b.(i) for minor permit modifications, and request that the minor permit modification procedures be followed.			
SIGNATURE OF RESPONSIBLE OFFICIAL OF COMPANY		DATE	
<b>6. CERTIFICATION OF COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS.</b>			
Except for requirements identified in the above statement for which compliance is not achieved, I hereby certify that, based on information and belief formed after reasonable inquiry, the air contaminant source identified in this application is in compliance with all applicable requirements.			
SIGNATURE OF RESPONSIBLE OFFICIAL OF COMPANY		DATE	
			
TYPE OR PRINT NAME OF RESPONSIBLE OFFICIAL Mr. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dan Hoy		OFFICIAL TITLE OF RESPONSIBLE OFFICIAL Director of Facilities, Bass Pro Shops	

**FORM OP-F01 – GENERAL COMMENTS – SECTION F****F01.00 – GENERAL COMMENTS**

INSTALLATION NAME	FIPS	PLANT NO.	YEAR SUBMITTED
Tracker Marine - Lebanon Plant	105	0046	2014

**1. GENERAL INFORMATION**

Comments relating to the Forms:

Form OP-D01 - Existing Plant-Wide Conditions:

PW001 Emission Limitation: 2. Alternative Coatings - Paint booths EP-10(1) and EP-10(4) were removed.

PW001 Operational Limitations: 2. & 3. Particulate Matter - Paint booths EP-10(1) and EP-10(4) were removed.

Form OP-D03 - Emission Unit Information

This form is included for all emission units permitted under Permit to Construct #052013-001.

For EP-23, Make-up Air Units, only the two new units are shown. The two older units are natural gas-fired and 2.5 MMBTU/hr each.

Comments relating to Part 70 Operating Permit OP2010-119A (Project #2012-04-065):

**I. Installation Description and Equipment Listing**

**Emission Units with Limitations**

- EU0010 (EP-01) has been subdivided into:

EP-01A Gluing Operations (Fugitive - Assembly Line)

EP-01B Gluing Operations (HEPA Filter)

EP-13 Flotation Foaming

(per Application for Authority to Construct and Request for Modification to Emission point Designations dated 4/15/11).

**Emission Units without Limitations**

- Solvent Wipe-down emission units EP-03 and EP-03A have been discontinued.

- Space Heating, EP-05, has been discontinued.

- Drying Ovens EP-12[1], EP-12[2] and EP-12[4] have been removed.

- Gasoline Storage Tank, EP-06, has been subdivided into:

EP-06A Gasoline Storage Tank, Working Loss

EP-06B Gasoline Storage Tank, Breathing Loss

- Diesel Storage Tank, EP-07, has been subdivided into:

EP-07A Diesel Storage Tank, Working Loss

EP-07B Diesel Storage Tank, Breathing Loss

- Log Cutting, EP-09, has been renamed Plywood Cutting (Sawdust)

- Plasma Cutters EP-11(segs. 1, 2, 3, 4) - All have stacks and exhaust outdoors during warmer months. Therefore, core permit requirement 10 CSR 10-6.170 Restriction of Particulate Matter Beyond the Premises of Origin, and state requirement 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants apply to these units.

**III. Emission Unit Specific Emission Limitations**

Permit Condition EU0010-002 and (EU0020 through EU0050)-001

- Emission units EU0030 (Paint Booth #1, EP-10[1]), EU0035 (Paint Booth #2, EP-10[2]), EU0050 (Paint Booth #4, EP-10[4]), and EU0060 (Solvent Wipe Down, EP-10A[all segments]) have been removed.

Permit Condition EU0035-002 and EU0060-001

- Both emission units (EP-10(2), paint booth #2 and EP-10A(2), toluene wipedown) were removed.

Comments relating to Permit to Construct 052013-001

The proposed new emission unit designations for existing equipment as listed in Form 1.2 of the application have been restored to the former designations due to concern expressed by MDNR that historical continuity would be lost. Please see the updated emission unit designations in Attachment B.

Changes to Emission Units in the original application to construct:

Make-Up Air Units #1 and #2 have been grouped with the two existing Make-Up Air Units as EU-23.

Acid Wipedown, EU-27, has been discontinued and replaced by the Acid Wash System, EU-15.

"Acid Wash", EU-15, has been renamed "Acid Wash System."

**DUPLICATE THIS FORM AS NEEDED**

**FORM OP-F01 – GENERAL COMMENTS – SECTION F****F01.00 – GENERAL COMMENTS**

INSTALLATION NAME

Tracker Marine - Lebanon Plant

FIPS

105

PLANT NO.

0046

YEAR SUBMITTED

2014

**1. GENERAL INFORMATION**

Comments relating to 2013 Emissions Inventory Questionnaire

Emission Unit designations are current, including the following changes:

EP-23, Make-up Air Units, groups all four make-up air units at the facility.

EP-29, Toluene Cleaner, was added for toluene usage.

**DUPLICATE THIS FORM AS NEEDED**



**APPENDIX B**

**Emission Unit Designations**

### Emission Unit Designations

Emission Unit Number	Emission Unit Description	Proposed Emission Unit Numbers - May 2013 Construction Permit	Status as of June 2014
EP - 01A	GLUING OPERATIONS (Fugitive - Assembly Line)	EU - 02A	Active
EP - 01B	GLUING OPERATIONS (HEPA Filter)	EU - 02B	Active
EP - 03A	TOLUENE THINNER		Replaced by Acid Wipedown during 2012 / Dismantled
EP - 05	KEROSENE SPACE HEATERS		Removed
EP - 06A Working Loss	GASOLINE STORAGE TANK	EU - 03A Working Loss	Active
EP - 06B Breathing Loss		EU - 03B Breathing Loss	
EP - 07A Working Loss	DIESEL STORAGE TANK	EU - 04A Working Loss	Active
EP - 07B Breathing Loss		EU - 04B Breathing Loss	
EP - 08A	WELDING - WIRE USAGE	EU - 05A	Active
EP - 08B	WELDING - ROD USAGE	EU - 05B	Active
EP - 09	PLYWOOD CUTTING (SAWDUST)	EU - 06	Active
EP - 10(1)	PAINT BOOTH #1		Dismantled
EP - 10(2)	PAINT BOOTH #2	EU - 07	Dismantled
EP - 10(3)	PAINT BOOTH #3	EU - 08	Active / Retained [Dual Booth]
EP - 10(4)	PAINT BOOTH #4	EU - 09	Dismantled
EP - 10A(1)	PAINT BOOTH #1 TOLUENE WIPE		Replaced by Acid Wipedown during 2012 / Dismantled
EP - 10A(2)	PAINT BOOTH #2 TOLUENE WIPE		
EP - 10A(3)	PAINT BOOTH #3 TOLUENE WIPE		
EP - 10A(4)	PAINT BOOTH #4 TOLUENE WIPE		
EP - 11(1)	PLASMA CUTTER #1 - 875 in./boat	EU - 11	Active
EP - 11(2)	PLASMA CUTTER #2 - 6,255 in./boat	EU - 10	Active
EP - 11(3)	PLASMA CUTTER #3 - 3,700 in./boat	EU - 12	Active
EP - 11(4)	PLASMA CUTTER #4 - 3,700 in./boat	EU - 13	Replaced by Plasma Cutter #6
EP - 11(5)	PLASMA CUTTER #5 - 2,400 in./boat		New EP - Installed 2013
EP - 11(6)	PLASMA CUTTER #6 - 3,700 in./boat		New EP - Installed 2014
EP - 12(1)	Drying Oven for Paint Booth #1		Dismantled
EP - 12(2)	Drying Oven for Paint Booth #2	Will be removed	Dismantled
EP - 12(3)	Drying Oven for Paint Booth #3	EU-08A	Active / Retained
EP - 12(4)	Drying Oven for Paint Booth #4	EU - 09A	Dismantled
EP - 13	FLOTATION FOAMING	EU - 01	Active
EP - 14	PONTOON BOAT TOUCH UP SPRAY PAINTING	EU - 14	Active
EP - 15	ACID WASH SYSTEM	EU - 15	Active
EP - 16	DRY-OFF OVEN	EU - 16	Active
EP - 17	POWDER COAT BOOTH #1	EU - 17	Active
EP - 18	INFRARED OVEN #1	EU - 18	Active
EP - 19	POWDER COAT BOOTH #2	EU - 19	Active
EP - 20	INFRARED OVEN #2	EU - 20	Active
EP - 21	CLEAR POWDER COAT BOOTH	EU - 21	Active
EP - 22	POWDER COAT CURE OVEN	EU - 22	Active
EP - 23	MAKE-UP AIR UNITS (4)	EU - 23	Active
EP - 24	BLANK (Formerly Make-Up Air Unit #2)	EU - 24	
EP - 25	INFRARED SPACE HEATERS (formerly propane)	EU - 25	Active
EP - 26	BURN-OFF OVEN	EU - 26	Active
EP - 27	ACID WIPEDOWN	EU - 27	Replaced by Acid Wash System during 2013
EP - 28	CONVECTION OVEN		Active
EP - 29	TOLUENE CLEANER		Active

Removed/Dismantled/Inactive

## **APPENDIX C**

### **Potential to Emit Calculations**

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit                      EP-01A Gluing Operations (Fugitive - Assembly Line)  
 SCC Code                            40200701  
 Control Efficiency of PM10        0.00%  
 Solids Transfer Efficiency        98.00%

**Maximum Hourly Design Rate**

90 Boats	2 shifts	0.5 gallons	0.59	= 2.655 Gallons/hour
1 shift	20 hours	1 Boat	1.00	

0.18 Gallons of VA 332 Adhesive per hour  
 2.475 Gallons of #348 Waterbase Adhesive per hour

Use of adhesive on the assembly lines is 59% of the total amount of adhesive used at the facility.

	Density (lbs/gal)	VOC content (lbs/gal)	Max HAP content (%)	Solids content (lbs/gal)	VOC emissions (tons/yr)	HAP emissions (tons/yr)	PM10 emissions (tons/yr)	PM2.5 emissions (tons/yr)
Adhesive								
VA 332 Adhesive	6.92	2.28	0.00%	4.64	1.80	0.00	0.07	0.07
#348 Waterbase Adhesive	9.0	4.05	0.20%	4.95	43.90	0.20	1.07	1.07
Sum PTE:					43.90	0.20	1.15	1.15

Maximum VOC, HAP, and PM emissions

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-01B Gluing Operations (HEPA Filter)  
 SCC Code: 40200701  
 Control Efficiency of PM10 99.00%  
 Solids Transfer Efficiency 98.00%

**Maximum Hourly Design Rate**

90 Boats	2 shifts	0.5 gallons	0.41	=1.85 Gallons/hour
1 shift	20 hours	1 Boat	1.00	

Use of adhesive in the carpet room is 41% of the total amount of adhesive used at the facility.

	Density (lbs/gal)	VOC content (lbs/gal)	Max HAP content (%)	Solids content (lbs/gal)	VOC emissions (tons/yr)	HAP emissions (tons/yr)	PM10 emissions (tons/yr)	PM2.5 emissions (tons/yr)
Adhesive								
VA 332 Adhesive	6.92	2.28	0.00%	4.64	18.47	0.00	0.01	0.01
Sum PTE:					18.47	0.00	0.01	0.01

Maximum VOC, HAP, and PM emissions

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-06A Gasoline Storage Tank - Working Loss  
 SCC Code: 40400108

**Maximum Hourly Design Rate**

3,300 gallons expected throughput = 0.825 gallons/hour  
 4,000 actual operating hours

Assume that the current fuel throughput is at MHDR.

3,300 gallons estimated from previous usage  
 4,000 hours = 20 h/day \* 4 days/wk \* 50 wks/yr

	Potential throughput (gallons)	Density (lbs/gal)	Potential throughput (lbs)	Max HAP content (%) <sup>3</sup>	Emission Factor for Working Loss (lbs/1000 gallons) <sup>1</sup>	HAP emissions (tons/yr)
Fuel Type						
Gasoline	7227	6.42	46,397	34.90%	54.23	0.439
<b>Sum PTE:</b>						<b>0.439</b>

**Note 1:** Individual fuel HAP emissions on this spreadsheet are based on the EPA tank emissions program 3.1 and are therefore not calculated at 100% emission rate, but rather "x" lbs of emissions per 1000 gallons of fuel.

**Note 2:** Unleaded Gasoline  
 benzene @ 4.90%  
 cumene @ 1.00%  
 ethyl benzene @ 2.00%  
 toluene @ 15.00%  
 xylene @ 12.00%

**Note 3:** Potential HAP emissions based on the highest HAP content of gasoline (34.9%).

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-06B Gasoline Storage Tank - Breathing Loss  
 SCC Code: 40400102

**Maximum Hourly Design Rate**

3,300 gallons expected throughput = 0.825 gallons/hour

4,000 actual operating hours

Assume that the current fuel throughput is at MHDR.

3,300 gallons estimated from previous usage

4,000 hours = 20 h/day \* 4 days/wk \* 50 wks/yr

	Potential throughput (gallons)	Density (lbs/gal)	Potential throughput (lbs)	Max HAP content (%) <sup>3</sup>	Emission Factor for Breathing Loss (lbs/1000 gallons) <sup>1</sup>	HAP emissions (tons/yr)
Fuel Type						
Gasoline	7227	6.42	46,397	34.90%	23.40	0.189
<b>Sum PTE:</b>						<b>0.189</b>

**Note 1:** Individual fuel HAP tpm emissions on this spreadsheet are based on the EPA tank emissions program 3.1 and are therefore not calculated at 100% emission rate, but rather "x" lbs of emissions per 1000 gallons of fuel.

**Note 2:** Unleaded Gasoline

benzene @ 4.90%

cumene @ 1.00%

ethyl benzene @ 2.00%

toluene @ 15.00%

xylene @ 12.00%

**Note 3:** Potential HAP emissions based on the highest HAP content of gasoline (34.9%).

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-07A Diesel Storage Tank - Working Loss  
 SCC Code: 40701614

**Maximum Hourly Design Rate**

13,500 gallons expected throughput = 3.375 gallons/hour  
 4,000 actual operating hours

Assume that the current fuel throughput is at MHDR.

13,500 gallons estimated from previous usage  
 4,000 hours = 20 h/day \* 4 days/wk \* 50 wks/yr

Fuel Type	Potential throughput (gallons)	Density (lbs/gal)	Potential throughput (lbs)	Max HAP content (%) <sup>3</sup>	Emission Factor for Working Loss (lbs/1000 gallons) <sup>1</sup>	HAP emissions (tons/yr)
Diesel	29,565	7.34	217,007	1.00%	0.078	0.000
<b>Sum PTE:</b>						<b>0.000</b>

**Note 1:** Individual fuel HAP tpm emissions on this spreadsheet are based on the EPA tank emissions program 3.1 and are therefore not calculated at 100% emission rate, but rather "x" lbs of emissions per 1000 gallons of fuel.

**Note 2: #2 Diesel**  
 naphthalene @ 1.00%

**Note 3:** Potential HAP emissions based on the highest HAP content of diesel #2 (1%).



**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-07B Diesel Storage Tank - Breathing Loss  
 SCC Code: 40701613

**Maximum Hourly Design Rate**

13,500 gallons expected throughput ÷ 3.375 gallons/hour  
 4,000 actual operating hours

Assume that the current fuel throughput is at MHDR.

13,500 gallons estimated from previous usage  
 4,000 hours = 20 h/day \* 4 days/wk \* 50 wks/yr

Fuel Type	Potential throughput (gallons)	Density (lbs/gal)	Potential throughput (lbs)	Max HAP content (%) <sup>3</sup>	Emission Factor for Breathing Loss (lbs/1000 gallons) <sup>1</sup>	HAP emissions (tons/yr)
Diesel	29,565	7.34	217,007	1.00%	0.170	0.000
Sum PTE:						0.000

**Note 1:** Individual fuel HAP tpm emissions on this spreadsheet are based on the EPA tank emissions program 3.1 and are therefore not calculated at 100% emission rate, but rather "x" lbs of emissions per 1000 gallons of fuel.

**Note 2: #2 Diesel**  
 naphthalene @ 1.00%

**Note 3:** Potential HAP emissions based on the highest HAP content of diesel #2 (1%).

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-08A Welding - Wire Usage  
 SCC Code: 30905226  
 Control Efficiency of PM10 0.00%

Maximum Hourly Design Rate	
50,000 lbs expected consumption	= 12.5 lbs/hour
4,000 actual operating hours	
Assumes that the welding is operating at the MHDR.	

50,000 lbs estimated from previous usage  
 4,000 hours = 20 h/day \* 4 days/wk \* 50 wks/yr

	PM10 Emission Factor (lbs/1000 lbs)	PM10 Emissions (tons/yr)	PM2.5 Emissions (tons/yr)
Welding Product			
Welding Wire	24.1	1.32	1.32
<b>Sum PTE:</b>		<b>1.32</b>	<b>1.32</b>

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-08B Welding - Rod Usage  
 SCC Code: 30905800  
 Control Efficiency of PM10: 0.00%

**Maximum Hourly Design Rate**

25,000 lbs expected consumption = 6.25 lbs/hour  
 4,000 actual operating hours

Assumes that the welding is operating at the MHDR.

25,000 lbs estimated from previous usage  
 4,000 hours = 20 h/day \* 4 days/wk \* 50 wks/yr

	PM10 Emission Factor (lbs/1000 lbs)	PM10 Emissions (tons/yr)	PM2.5 Emissions (tons/yr)
Welding Product			
Welding Wire	5.5	0.15	0.15
<b>Sum PTE:</b>		0.15	0.15

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-09 Plywood Cutting (Sawdust)  
 SCC Code: 30700802  
 Control Efficiency of PM10 85.00%

**Maximum Hourly Design Rate**

2,500 tons plywood = 0.285 tons/hour  
 2000 operating hours

2,500 tons estimated from previous usage  
 2000 hours = 10 hr/day \* 4 days/wk \* 50 wks/year

	PM10 Emission Factor (lbs/ton)	PM10 Emissions (tons/yr)	PM2.5 Emissions (tons/yr)
EP-09 Plywood Usage	0.2	0.04	0.04
<b>Sum PTE:</b>		<b>0.04</b>	<b>0.04</b>

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-10(3) Paint Booth #3 - Dual Booth  
 SCC Code: 40200101  
 Control Efficiency of PM10 97.00%  
 Solids Transfer Efficiency 65.00%

**1. Maximum Hourly Design Rate**

<b>Maximum Hourly Design Rate - Touchup of Powder-Coated Boats</b>			
30 Boats	1 shift	0.75 Gallons	= 2.25 Gallons/Hour
1 shift	10 hours	1 Boat	

0.75 gallons per boat  
 2.25 gallons per hour

<b>Maximum Hourly Design Rate - Camouflage Painting of Jon Boats</b>			
10 Boats	1 shift	0.85 Gallons <sup>2</sup>	= 0.85 Gallons/Hour
1 shift	10 hours	1 Boat	

0.85 gallons per boat  
 0.85 gallons per hour

## 2. PTE Calculations

### Sum of PTE for both processes

Process	VOC (tons/yr)	HAPs (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)
Touch-up Painting	54.50	71.83	0.36	0.36
Camouflage Painting	39.99	12.08	0.22	0.22
<b>Total PTE (tons/yr)</b>	<b>94.48</b>	<b>83.91</b>	<b>0.58</b>	<b>0.58</b>

### Touch-up Painting

Paint	Density (lbs/gal)	VOC content (lbs/gal)	Max HAP content (%)	Solids content (lbs/gal)	VOC emissions (tons/yr)	HAP emissions (tons/yr)	PM10 emissions (tons/yr)	PM2.5 emissions (tons/yr)
PPG Touchup Paint - all colors	8.01	5.53	91.00%	2.48			0.26	0.26
Touchup Paint - clear	7.84	4.41	0.00%	3.43	43.44	0.00	0.36	0.36
<b>Sum PTE (tons/yr):</b>					<b>54.50</b>	<b>71.83</b>	<b>0.36</b>	<b>0.36</b>

### Camouflage Painting

Paint	Density (lbs/gal)	VOC content (lbs/gal)	Max HAP content (%)	Solids content (lbs/gal)	VOC emissions (tons/yr)	HAP emissions (tons/yr)	PM10 emissions (tons/yr)	PM2.5 emissions (tons/yr)
Primer, Base, Wash, Pewter	8.26	5.94	22.50%	2.32				
Charcoal Green Camouflage	8.09	4.78	17.00%	3.31	17.80	5.12	0.13	0.13
Marsh Grass Camouflage	8.36	4.80	16.00%	3.56	17.87	4.98	0.14	0.14
Mud Brown Camouflage	8.15	4.80	17.00%	3.35	17.87	5.16	0.13	0.13
<b>Sum PTE (tons/yr):</b>					<b>39.99</b>	<b>12.08</b>	<b>0.22</b>	<b>0.22</b>

**Note 1:** Primer information from 2009 construction permit application; camouflage paint information from plant.

**Note 2:** Sum of paint and primer per boat

Maximum VOC, HAP and PM10 emissions from the different types of coatings applied in the paint booth. The PTE from the paint booth is the sum of these maximum values for each pollutant.

### 3. HAPs

#### Touch-up Painting

Touch-up Paints	HAPs	Percentage
Touch-up paint, all colors	Xylene	60.00%
	Ethylbenzene	13.00%
	Toluene	7.00%
	m-xylene	5.00%
	Methyl isobutyl ketone	5.00%
	p-xylene	1.00%

#### Camouflage Painting

Primer/Paint	HAPs	Percentage
Primer, Base, Wash, Pewter	Methyl Isobutyl Ketone (MIBK)	8.00%
	Toluene	7.50%
	Zinc Chromate	7.00%
Charcoal Green Camouflage	Xylene	17.00%
Marsh Grass Camouflage	Xylene	12.00%
	Ethylbenzene	4.00%
Mud Brown Camouflage	Xylene	17.00%

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-11(1) Plasma Cutter #1  
 SCC Code: 30903008  
 Control Efficiency of PM10 99.90%

Maximum Hourly Design Rate			
875.2 inches cut	3.0 Boats cut	1	= 2.626 1,000 in. cut/hour
1 Boat	1 hour	1,000	

The potential to emit PM<sub>10</sub> is calculated as follows:

$$\frac{2.626 \text{ 1,000 inches}}{1 \text{ hour}} \times \frac{0.020275 \text{ lbs PM}_{10}}{1,000 \text{ inches cut}} \times \frac{1 \text{ ton}}{2,000 \text{ lbs}} \times \frac{8,760 \text{ hours}}{\text{year}} \times (1 - 0.999 \text{ control efficiency}) = 0.0002 \text{ tons/year}$$

The potential to emit PM<sub>2.5</sub> is calculated as follows:

$$\frac{3.0 \text{ boats cut}}{1 \text{ hour}} \times \frac{398 \text{ lbs Al}}{1 \text{ boat}} \times \frac{8760 \text{ hours}}{\text{year}} \times \frac{0.0860 \text{ lbs PM}_{2.5}}{2000 \text{ lbs}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} \times (1 - 0.999 \text{ control efficiency}) = 0.0002 \text{ tons/year}$$

**Notes:**

The emission factor for EP-11(1) was derived from a 1994 study by the American Welding Society (published in Sweden), since there is no published emission factor in AP-42, the factor information retrieval (FIRE), or elsewhere. The emission factor in the welding study is 0.1622 lbs PM<sub>10</sub>/1,000 inches cut for 1" aluminum thickness. The thickness of aluminum cut at plasma cutter #1 is 0.125 inches thick and the emission factor is calculated as follows:

$$(0.1622 \text{ lbs PM}_{10}/[1,000 \text{ inches cut} \times 1 \text{ inch thickness}]) \times 0.125 \text{ inch thickness} = 0.020275 \text{ lbs PM}_{10}/1,000 \text{ inches cut.}$$

The emission factor for PM<sub>2.5</sub> is from CEIDARS TABLE-Fabricated Metals, Arc Welding, Oxy Fuel, Copper, Zinc, Bath.



**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-11(2) Plasma Cutter #2  
 SCC Code: 30903008  
 Control Efficiency of PM10 99.90%

**Maximum Hourly Design Rate**

6,255.2 inches cut	2.0 Boats cut	1	= 12.5104 1,000 inches cut/hour
1 Boat	1 hour	1,000	

The potential to emit PM10 is calculated as follows:

12.5104 1,000 inches	0.0165 lbs PM10	1 ton	8,760 hours	*(1- 0.999 control efficiency) = 0.0009 tons/year
hour	1,000 inches cut	2,000 lbs	year	

The potential to emit PM2.5 is calculated as follows:

2.0 boats cut	754 lbs Al	8760 hours	0.0860 lbs PM2.5	1 ton	*(1- 0.999 control efficiency) = 0.0003 tons/year
1 hour	1 boat	year	2000 lbs	2000 lbs	

**Notes:**

The emission factor for EP-11(2) was derived from a 1994 study by the American Welding Society (published in Sweden), since there is no published emission factor in AP-42, the factor information retrieval (FIRE), or elsewhere. The emission factor in the welding study is 0.1622 lbs <sub>PM10</sub>/1,000 inches cut for 1" aluminum thickness. The thickness of aluminum cut at plasma cutter #2 is 0.1019 inches thick and the emission factor is calculated as follows:

$(0.1622 \text{ lbs PM}_{10}/[1,000 \text{ inches cut} * 1 \text{ inch thickness}]) * 0.1019 \text{ inch thickness} = 0.0165 \text{ lbs PM}_{10}/1,000 \text{ inches cut.}$

The emission factor for PM2.5 is from CEIDARS TABLE-Fabricated Metals, Arc Welding, Oxy Fuel, Copper, Zinc, Bath.

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-11(3) Plasma Cutter #3  
 SCC Code: 30903008  
 Control Efficiency of PM10 99.90%

Maximum Hourly Design Rate			
3,700 inches cut	2.0 Boats cut	1	= 7.4 1,000 inches cut/hour
1 Boat	1 hour	1,000	

The potential to emit PM10 is calculated as follows:

7.4 1,000 inches	0.020275 lbs PM10	1 ton	8,760 hours	*(1- 0.999 control efficiency) = 0.0006 tons/year
hour	1,000 inches cut	2,000 lbs	year	

The potential to emit PM2.5 is calculated as follows:

2.0 boats cut	398 lbs Al	8760 hours	0.0860 lbs PM2.5	1 ton	*(1- 0.999 control efficiency) = 0.0001 tons/year
1 hour	1 boat	year	2000 lbs	2000 lbs	

**Notes:**

The emission factor for EP-11(3) was derived from a 1994 study by the American Welding Society (published in Sweden), since there is no published emission factor in AP-42, the factor information retrieval (FIRE), or elsewhere. The emission factor in the welding study is 0.1622 lbs <sub>PM10</sub>/1,000 inches cut for 1" aluminum thickness. The thickness of aluminum cut at plasma cutter #3 is 0.125 inches thick and the emission factor is calculated as follows:

$(0.1622 \text{ lbs PM}_{10} / [1,000 \text{ inches cut} * 1 \text{ inch thickness}]) * 0.125 \text{ inch thickness} = 0.020275 \text{ lbs PM}_{10} / 1,000 \text{ inches cut.}$

The emission factor for PM2.5 is from CEIDARS TABLE-Fabricated Metals, Arc Welding, Oxy Fuel, Copper, Zinc, Bath.

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-11(4) Plasma Cutter #4 (In Plant 2 - Will be replaced by EP-11(6))  
 SCC Code: 30903008  
 Control Efficiency of PM10 99.90%

Maximum Hourly Design Rate			
3,700 inches cut	3.0 Boats cut	1	= 11.1 1,000 inches cut/hour
1 Boat	1 hour	1,000	

The potential to emit PM10 is calculated as follows:

11.1 1,000 inches	0.020275 lbs PM10	1 ton	8,760 hours	*(1- 0.999 control efficiency)	=0.0010 tons/year
hour	1,000 inches cut	2,000 lbs	year		

The potential to emit PM2.5 is calculated as follows:

3.0 boats cut	398 lbs Al	8760 hours	0.0860 lbs PM2.5	1 ton	*(1- 0.999 control efficiency)	= 0.0002 tons/year
1 hour	1 boat	year	2000 lbs	2000 lbs		

**Notes:**

The emission factor for EP-11(4) was derived from a 1994 study by the American Welding Society (published in Sweden), since there is no published emission factor in AP-42, the factor information retrieval (FIRE), or elsewhere. The emission factor in the welding study is 0.1622 lbs  $PM_{10}$ /1,000 inches cut for 1" aluminum thickness. The thickness of aluminum cut at plasma cutter #4 is 0.125 inches thick and the emission factor is calculated as follows:

$(0.1622 \text{ lbs } PM_{10} / ([1,000 \text{ inches cut} * 1 \text{ inch thickness}]) * 0.125 \text{ inch thickness} = 0.020275 \text{ lbs } PM_{10} / 1,000 \text{ inches cut.}$

The emission factor for PM2.5 is from CEIDARS TABLE-Fabricated Metals, Arc Welding, Oxy Fuel, Copper, Zinc, Bath.

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-11 (5) Plasma Cutter  
 SCC Code: 30903008  
 Control Efficiency of PM10 99.90%

Maximum Hourly Design Rate				
2,400 inches cut	3.0 Boats cut	1	= 7.2 1,000 in. cut/hour	
1 Boat	1 hour	1,000		

The potential to emit PM10 is calculated as follows:

7.2 1,000 inches	0.0162 lbs PM10	1 ton	8,760 hours	*(1- 0.999 control efficiency)	= 0.0005 tons/year
hour	1,000 inches cut	2,000 lbs	year		

The potential to emit PM2.5 is calculated as follows:

3.0 boats cut	398 lbs Al	8760 hours	0.0860 lbs PM2.5	1 ton	*(1- 0.999 control efficiency)	= 0.0002 tons/year
1 hour	1 boat	year	2000 lbs	2000 lbs		

**Notes:**

The emission factor for EP-11(5) was derived from a 1994 study by the American Welding Society (published in Sweden), since there is no published emission factor in AP-42, the factor information retrieval (FIRE), or elsewhere. The emission factor in the welding study is 0.1622 lbs <sub>PM10</sub>/1,000 inches cut for 1" aluminum thickness. The thickness of aluminum cut at plasma cutter #5 is 0.1019 inches thick and the emission factor is calculated as follows:

$$(0.1622 \text{ lbs PM}_{10}/[1,000 \text{ inches cut} * 1 \text{ inch thickness}]) * 0.100 \text{ inch thickness} = 0.0162 \text{ lbs PM}_{10}/1,000 \text{ inches cut.}$$

The emission factor for PM2.5 is from CEIDARS TABLE-Fabricated Metals, Arc Welding, Oxy Fuel, Copper, Zinc, Bath.

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-11 (6) Plasma Cutter  
 SCC Code: 30903008  
 Control Efficiency of PM10 99.90%

Maximum Hourly Design Rate			
3,700 inches cut	3.0 Boats cut	1	= 11.1 1,000 in. cut/hour
1 Boat	1 hour	1,000	

The potential to emit PM10 is calculated as follows:

11.1 1,000 inches	0.020275 lbs PM10	1 ton	8,760 hours	*(1- 0.999 control efficiency) = 0.0010 tons/year
hour	1,000 inches cut	2,000 lbs	year	

The potential to emit PM2.5 is calculated as follows:

3.0 boats cut	398 lbs Al	8760 hours	0.0860 lbs PM2.5	1 ton	*(1- 0.999 control efficiency) = 0.0002 tons/year
1 hour	1 boat	year	2000 lbs	2000 lbs	

**Notes:**

The emission factor for EP-11(6) was derived from a 1994 study by the American Welding Society (published in Sweden), since there is no published emission factor in AP-42, the factor information retrieval (FIRE), or elsewhere. The emission factor in the welding study is 0.1622 lbs <sub>PM10</sub>/1,000 inches cut for 1" aluminum thickness. The thickness of aluminum cut at plasma cutter #6 is 0.125 inches thick and the emission factor is calculated as follows:

$(0.1622 \text{ lbs PM}_{10}/[1,000 \text{ inches cut} * 1 \text{ inch thickness}]) * 0.125 \text{ inch thickness} = 0.020275 \text{ lbs PM}_{10}/1,000 \text{ inches cut.}$

The emission factor for PM2.5 is from CEIDARS TABLE-Fabricated Metals, Arc Welding, Oxy Fuel, Copper, Zinc, Bath.

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit EP-13 Flotation Foaming (Fugitive)  
 SCC Code 40200701  
 Control Efficiency of PM10 0.00%  
 Solids Transfer Efficiency 95.00% See Note 3 below.

**Maximum Hourly Design Rate**

90 Boats	1 shift	76.68 lb <sup>1</sup>	= 690.12 lbs/hour
1 shift	10 hours	Boat	

	Density (lbs/gal)	VOC content (%)	Max HAP content (%)	Solids content (%)	VOC emissions (tons/yr) <sup>2</sup>	HAP emissions (tons/yr) <sup>2</sup>	Percent used per boat
Flotation Foam							
EcoMate Flotation Foam <sup>4</sup>	9.09	5.00%	54.00%	95.00%	0.02	0.16	99.60%
Aerosol Touch & Foam	8.423	15.85%	13.00%	84.15%	0.00	0.00	0.40%
<b>Sum PTE:</b>					<b>0.02</b>	<b>0.16</b>	

**Note 1:** Amount is the maximum used on any boat line. Information is from spreadsheet provided by the plant of foam usage for all models of boats.

**Note 2:** The emission rate for VOCs and HAPs from this product is 0.0001%.

**Note 3:** PM10 emissions are not visibly observable during this process and are excluded from the hourly PM limitation. See March 2011 Initial Compliance Report.

**Note 4:** EcoMate Foam consists of Parts A & B and Blowing Agent. Part A constitutes 57.14% of total purchases. HAP = MDI @ 45% in Part A.

**HAPs**

	HAP	Percentage	Emission Factor
Flotation Foam Polyurethane Base	MDI (CAS 101-68-8)	45.00%	5.714E-07

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit	EP-14 Pontoon Boat Touch Up Spray Painting
SCC Code	40200101
Control Efficiency of PM10	0.00%
Solids Transfer Efficiency	0.00% Unknown

<b>Maximum Hourly Design Rate</b>	Based on 2013 Usage of PN 169533	
1871 lbs	1 year	= 0.936 lbs/hour
year	2000 operational hours	

	Density (lbs/gal)	VOC content (%)	Max HAP content (%)	Solids content (%)	VOC emissions (tons/yr)	HAP emissions (tons/yr)	PM10 emissions (tons/yr)	PM2.5 emissions (tons/yr)
Paint								
Paint, Spray, Ano. Lite, Alum: 12 oz	6.51	87.53%	13.00%	12.47%	3.59	0.53	0.51	0.51
<b>Sum PTE (tons/yr)</b>					3.59	0.53	0.51	0.51

Pontoon Boat Spray Touch-up Paint	HAPs	Percentage
Paint, Spray, Ano. Lite, Alum: 12 oz	Xylene	10.00%
	Ethylbenzene	3.00%

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-15 Acid Wash  
 SCC Code: 40299998

Maximum Hourly Design Rate			
90 Boats	1 shift	1 Gallon <sup>2</sup>	= 9 Gallons/Hour
1 shift	10 hours	1 Boat	

1 gallon/boat  
 9 gallons per hour  
 16,000 boats per year

	Density (lbs/gal)	VOC content (lbs/gal)	Max HAP content (%)	Solids content (lbs/gal)	VOC emissions (tons/yr)	HAP emissions (tons/yr)	PM10 emissions (tons/yr)	PM2.5 emissions (tons/yr)	Material Usage per Boat (gal) <sup>1</sup>	Concentration of chemical in water (%)
Cleaners										
GF PHOS 252 DS	9.89	0	0.00%	0.00	0.00	0.00	0.00	0.00	0.33	3%
GF SEAL 320 NCS	9.19	0	0.00%	0.00	0.00	0.00	0.00	0.00	0.33	0.5%
Sum PTE:					0.00	0.00	0.00	0.00		

**Note 1:** Conservative estimates of each cleaner per boat; actual usage may be much lower.

**Note 2:** Conservative estimate of 1 gallon of acid wash used per boat; actual usage may be much lower.

highest PTE content for each pollutant of concern



**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-23 Make-Up Air Units (4)  
 SCC Code: 10200603

<b>Make-Up Air Unit</b>	<b>MMBTU/h</b>
New Make-Up Air Units (June 2013)	2 * 3.3 = 6.6
Older Make-Up Air Units	2 * 2.5 = 5.0
<b>Total</b>	<b>11.6 MMBTU/h</b>

From the FIRE software, the emission factors (<10 mmbtu/hr heat input) are as follows:

PM <sub>10</sub> :	7.6 lbs/mmscf
PM <sub>2.5</sub> :	7.6 lbs/mmscf
SO <sub>x</sub> :	0.6 lbs/mmscf
NO <sub>x</sub> :	100.0 lbs/mmscf
VOC:	5.5 lbs/mmscf
CO:	84.0 lbs/mmscf

Thus, potential emissions for each emission unit (EU) are calculated as follows:

		<b>Emissions (tons/yr)</b>	<b>Emissions (lbs/day)</b>
<b>PM<sub>10</sub>:</b>	$(7.6 \text{ lbs/mmscf}) * (1 \text{ mmscf}/1000 \text{ mmbtus}) * (11.6 \text{ mmbtus}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	<b>0.386</b>	<b>2.116</b>
<b>PM<sub>2.5</sub>:</b>	$(7.6 \text{ lbs/mmscf}) * (1 \text{ mmscf}/1000 \text{ mmbtus}) * (11.6 \text{ mmbtus}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	<b>0.386</b>	<b>2.116</b>
<b>SO<sub>x</sub>:</b>	$(0.6 \text{ lbs/mmscf}) * (1 \text{ mmscf}/1000 \text{ mmbtus}) * (11.6 \text{ mmbtus}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	<b>0.030</b>	<b>0.167</b>
<b>NO<sub>x</sub>:</b>	$(100 \text{ lbs/mmscf}) * (1 \text{ mmscf}/1000 \text{ mmbtus}) * (11.6 \text{ mmbtus}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	<b>5.081</b>	<b>27.840</b>
<b>VOC:</b>	$(5.5 \text{ lbs/mmscf}) * (1 \text{ mmscf}/1000 \text{ mmbtus}) * (11.6 \text{ mmbtus}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	<b>0.279</b>	<b>1.531</b>
<b>CO:</b>	$(84 \text{ lbs/mmscf}) * (1 \text{ mmscf}/1000 \text{ mmbtus}) * (11.6 \text{ mmbtus}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	<b>4.268</b>	<b>23.386</b>

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-26 Burn-off Oven  
 SCC Code: 10200603  
 Control Efficiency: 99.90%  
 MHDR: 0.875 MMBTU/hr

Emission Factors from FIRE (<10 mmBTU/hr heat input):

PM<sub>10</sub>: 7.6 lbs/mmescf  
 PM<sub>2.5</sub>: 7.6 lbs/mmescf  
 SO<sub>x</sub>: 0.6 lbs/mmescf  
 NO<sub>x</sub>: 100.0 lbs/mmescf  
 VOC: 5.5 lbs/mmescf  
 CO: 84.0 lbs/mmescf

		Emissions (tons/yr)	Emissions (lbs/day)
<b>PM<sub>10</sub>:</b>	$(7.6 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (0.875 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.000	0.000
<b>PM<sub>2.5</sub>:</b>	$(7.6 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (0.875 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.000	0.000
<b>SO<sub>x</sub>:</b>	$(0.6 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (0.875 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.000	0.000
<b>NO<sub>x</sub>:</b>	$(100 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (0.875 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.000	0.002
<b>VOC:</b>	$(5.5 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (0.875 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.000	0.000
<b>CO:</b>	$(84 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (0.875 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.000	0.002

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-29 Toluene Cleaner  
 SCC Code: 40200901

Maximum Hourly Design Rate			
<b>Rate during 2013:</b>			
4000 lbs purchased	1 year	1 gallon	= 0.275 gallons/hr
1 year	2000 operating hours	7.26 lbs	

	Density (lbs/gal)	VOC content (lbs/gal)	Max HAP content (%)	Solids content (lbs/gal)	VOC emissions (tons/yr)	HAP emissions (tons/yr)	PM10 emissions (tons/yr)	PM2.5 emissions (tons/yr)
Cleaners								
Toluene	7.26	7.26	100.00%	0.00	1.20	1.20	0.00	0.00
Sum PTE:					1.20	1.20	0.00	0.00

Potential to Emit Calculations  
Tracker Marine Group - Lebanon Facility  
Operating Permit Renewal  
June 2014

1) PTE Summary - Current Operating Rates

PTE by Pollutant (tons per year)								
Emission Unit	VOC	HAPs	PM10	PM2.5	SOx	NOx	CO	CO <sub>2</sub> Equiv
EP-01A	43.90	0.20	1.15	1.15				
EP-01B	18.47	0.00	0.01	0.01				
EP-06A		0.439						
EP-06B		0.189						
EP-07A		8.5E-05						
EP-07B		0.000						
EP-08A			1.32	1.32				
EP-08B			0.15	0.15				
EP-09			0.04	0.04				
EP-10(3)	94.48	83.91	0.58	0.58				
EP-11(1)			0.0002	0.0002				
EP-11(2)			0.0009	0.0003				
EP-11(3)			0.0006	0.0001				
EP-11(4)			0.0010	0.0002				
EP-11(5)			0.0005	0.0002				
EP-11(6)			0.0010	0.0002				
EP-13	0.02	0.16						
EP-14	3.59	0.53	0.51	0.51				
EP-15	0.00	0.00	0.00	0.00				
EP-23	0.28		0.39	0.39	0.03	5.08	4.27	See GHG Calcs
EP-26	0.00		0.00	0.00	0.00	0.00	0.00	See GHG Calcs
EP-29	1.20	1.20	0.00	0.00				
<b>Totals</b>	<b>161.95</b>	<b>86.64</b>	<b>4.14</b>	<b>4.14</b>	<b>0.03</b>	<b>5.08</b>	<b>4.27</b>	<b>See GHG Calcs</b>

2) PTE Summary - Projected Operating Rates (+25%)

PTE by Pollutant (tons per year)								
	VOC	HAPs	PM10	PM2.5	SOx	NOx	CO	CO <sub>2</sub> Equiv
<b>Totals + 25%</b>	<b>202.44</b>	<b>108.29</b>	<b>5.17</b>	<b>5.17</b>	<b>0.04</b>	<b>6.35</b>	<b>5.34</b>	<b>See GHG Calcs</b>

# Green House Gas Emissions (GHG) PTE

Combined Flow for all combustion sources		Default CO <sub>2</sub> Emission Factor <sup>1</sup>	Default CH <sub>4</sub> Emission Factor <sup>2</sup>	Default N <sub>2</sub> O Emission Factor <sup>2</sup>	CO <sub>2</sub> Emissions	CO <sub>2</sub> Emissions	CH <sub>4</sub> Emissions	N <sub>2</sub> O Emissions	CO <sub>2</sub> e Equivalent	CO <sub>2</sub> e Equivalent
MMBTU/hr	MMBTU/yr	kg CO <sub>2</sub> /MMBtu	kg CH <sub>4</sub> /MMBtu	kg N <sub>2</sub> O/MMBtu	metric tons/year	short tons/year	metric tons/year	metric tons/year	metric tons/year	short tons/year
35.555	311,462	53.02	0.001	0.0001	16,514	18,203	0.31	0.031	16,530	18,221

<sup>1</sup> Table C-1 to Subpart C of Part 98

<sup>2</sup> Table C-2 to Subpart C of Part 98

Current PTE 18,221  
Projected PTE (+ 25%) 22,776

## Global Warming Potential

CO <sub>2</sub>	1
CH <sub>4</sub>	21
N <sub>2</sub> O	310

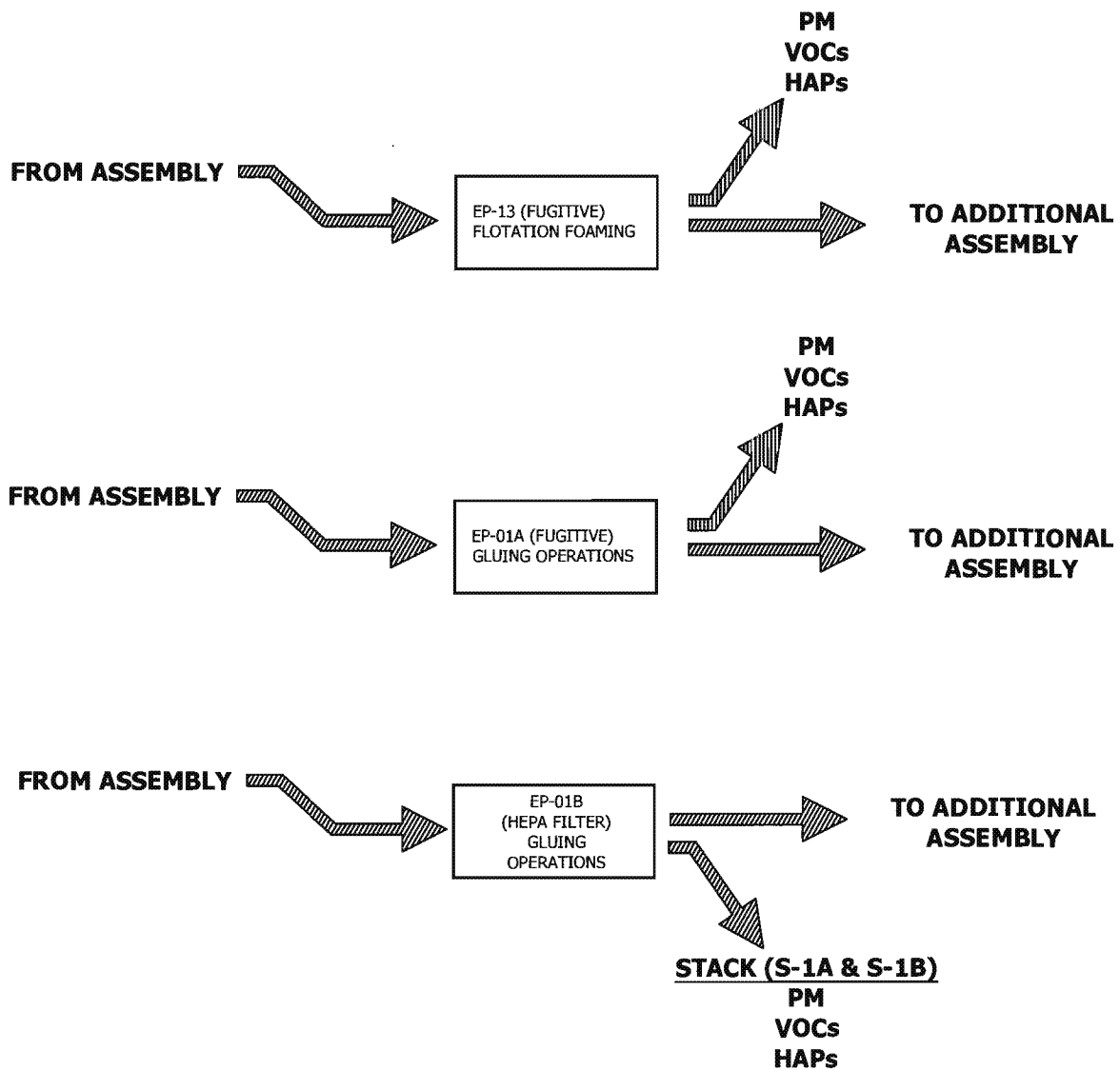
Metric tons to short tons conversion factor

1.1023

EP	Description	MHDR	Unit
EP-12(3)	Paint Booth Drying Oven	1.5	MMBTU
EP-15	Acid Wash System	4.00	MMBTU
EP-16	Dry-Off Oven	1.60	MMBTU
EP-18	Infrared Oven #1	0.72	MMBTU
EP-20	Infrared Oven #2	0.72	MMBTU
EP-22	Powder Coat Cure Oven	3.2	MMBTU
EP-23	Make-up Air Unit #1	2.5	MMBTU
EP-23	Make-up Air Unit #2	2.5	MMBTU
EP-23	Make-up Air Unit #3	3.3	MMBTU
EP-23	Make-up Air Unit #4	3.3	MMBTU
EP-25	Infrared Space Heaters	4.85	MMBTU
EP-26	Burn-Off Oven	0.875	MMBTU
EP-28	Convection Oven	2.4	MMBTU
N/A	Plant Furnaces Combined	4.09	MMBTU
	Total	35.555	MMBTU

**APPENDIX D**

**Process Flow Diagrams**



CHECKED BY:  
S. ROBORDS

E.W.I. # 130012  
DRAWN BY: MEK  
JUN. 19, 2014

NOT-TO-SCALE



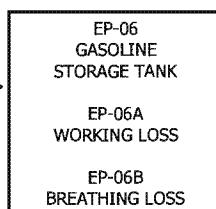
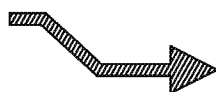
1455 E. Chestnut Expressway  
Springfield, MO 65802

## PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE  
**1.1a**

**GASOLINE  
PURCHASED**

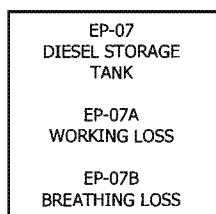
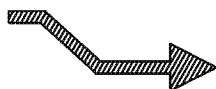


**GASOLINE  
USAGE**



**VOCs  
HAPs**

**DIESEL  
PURCHASED**



**DIESEL  
USAGE**



**VOCs  
HAPs**

**NORTH**



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S. ROBORDS

E.W.I. # 130012  
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JUN. 19, 2014

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1455 E. Chestnut Expressway  
Springfield, MO 65802

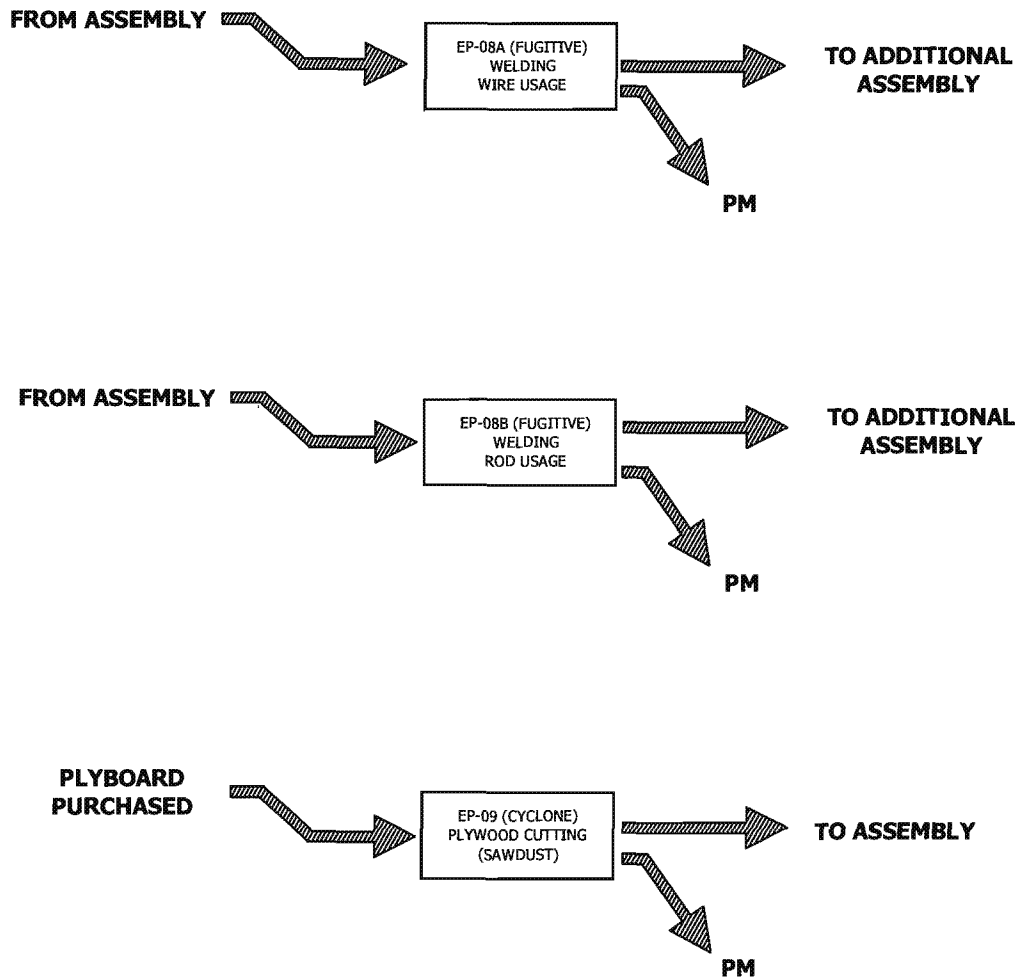
**PROCESS FLOW DIAGRAM**

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

**FIGURE**

**1.1b**





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DRAWN BY: MEK  
JUN. 19, 2014

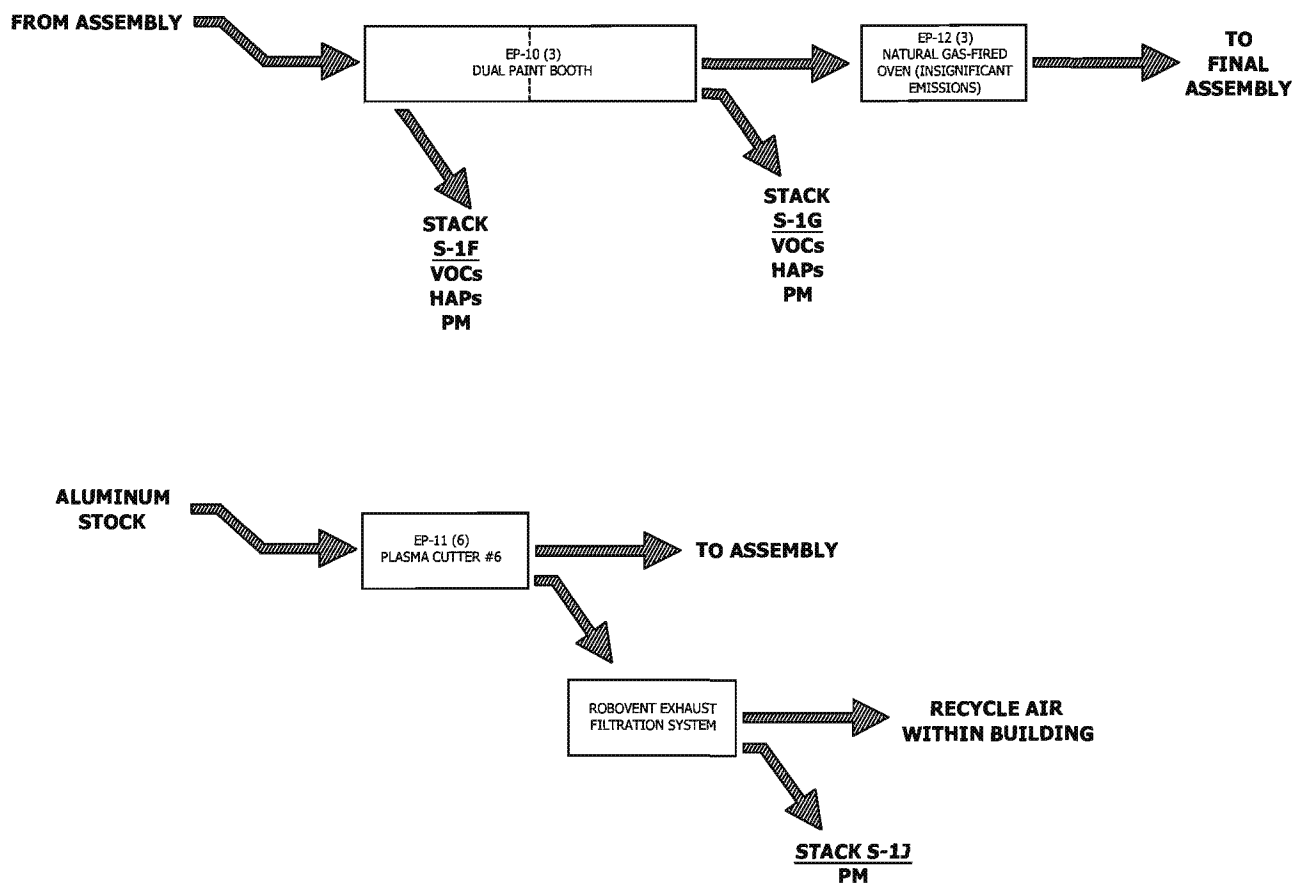
NOT-TO-SCALE



## PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE  
**1.1c**



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S. ROBORDS

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JUN. 19, 2014

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1455 E. Chestnut Expressway  
Springfield, MO 65802

## PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #2  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE

1.1d

ALUMINUM  
STOCK

EP-11 (1)  
PLASMA CUTTER #1

TO ASSEMBLY

ROBOVENT EXHAUST  
FILTRATION SYSTEM

RECYCLE AIR  
WITHIN BUILDING

STACK S-1I  
PM

ALUMINUM  
STOCK

EP-11 (2)  
PLASMA CUTTER #2

TO ASSEMBLY

ROBOVENT EXHAUST  
FILTRATION SYSTEM

RECYCLE AIR  
WITHIN  
BUILDING

STACK S-1K  
PM

ALUMINUM  
STOCK

EP-11 (3)  
PLASMA CUTTER #3

TO ASSEMBLY

ALUMINUM  
STOCK

EP-11 (5)  
PLASMA CUTTER #5

TO ASSEMBLY

ROBOVENT EXHAUST  
FILTRATION SYSTEM

RECYCLE AIR  
WITHIN BUILDING

STACK S-1U  
PM



CHECKED BY:  
S. ROBORDS

E.W.I. # 130012  
DRAWN BY: MEK  
JUN. 19, 2014

NOT-TO-SCALE

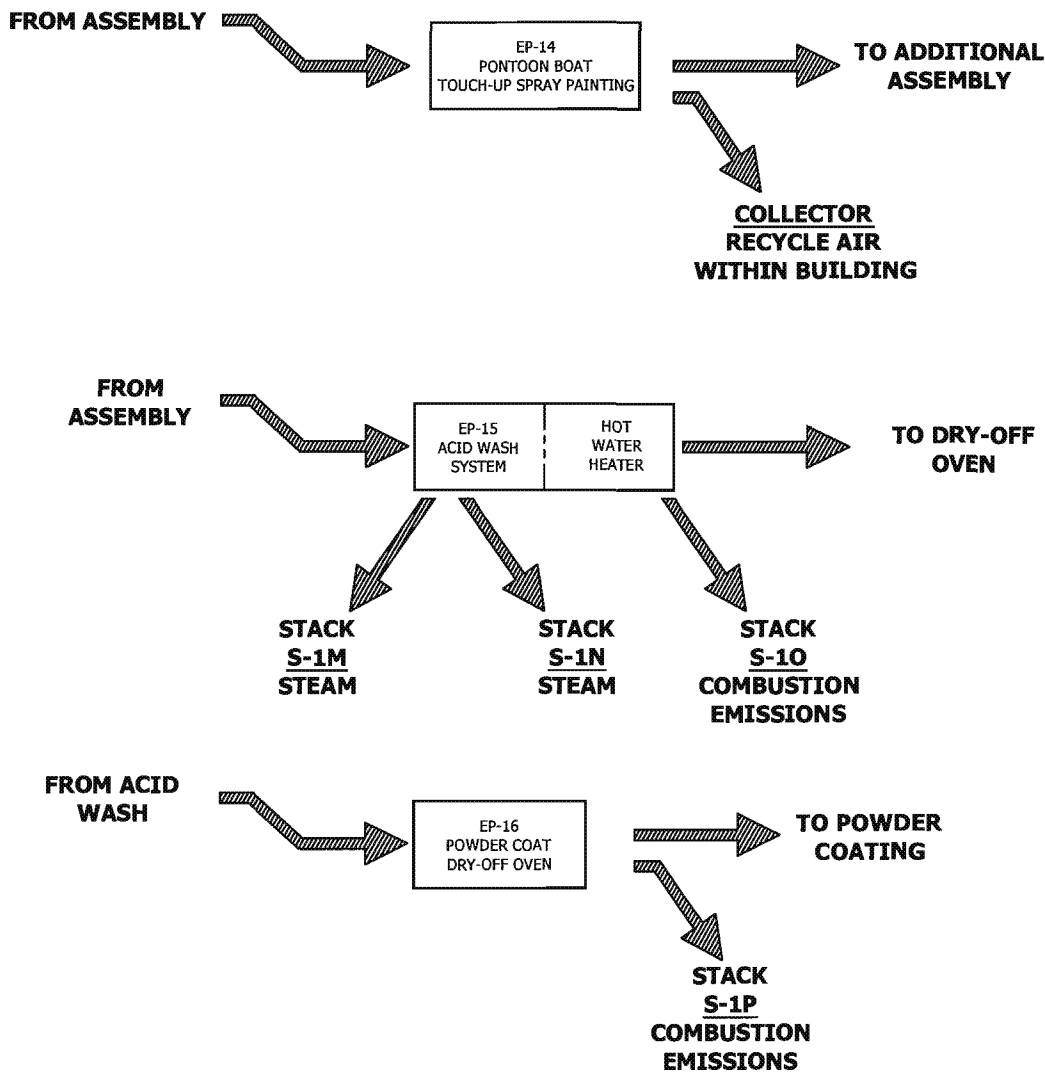


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## PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE  
**1.1e**



NORTH



CHECKED BY:  
S. ROBORDS

E.W.I. # 130012  
DRAWN BY: MEK  
JUN. 19, 2014

NOT-TO-SCALE



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Springfield, MO 65802

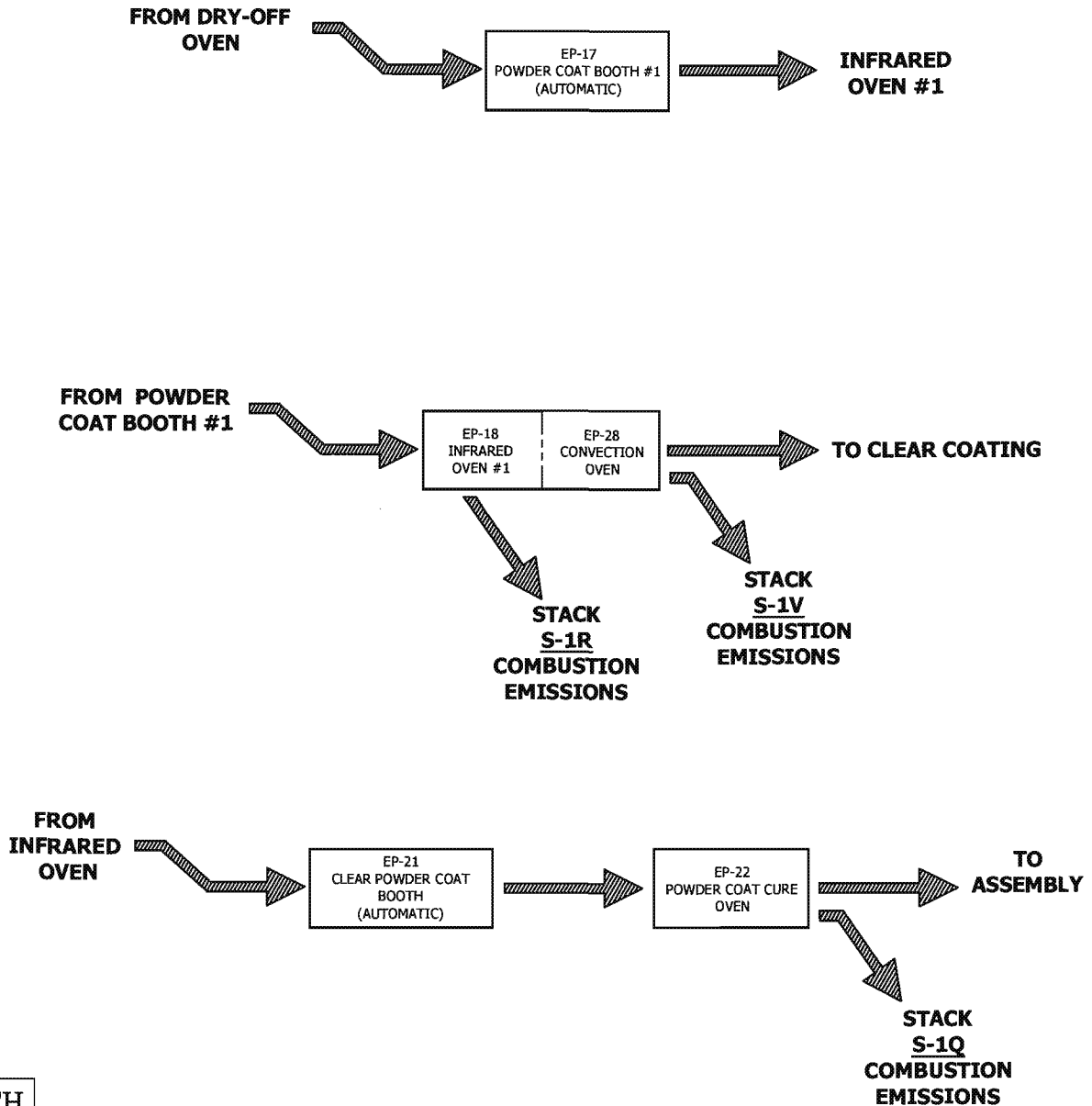
## PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE

1.1f

# SINGLE COLOR BOATS



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S. ROBORDS

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DRAWN BY: MEK  
JUN. 19, 2014

NOT-TO-SCALE



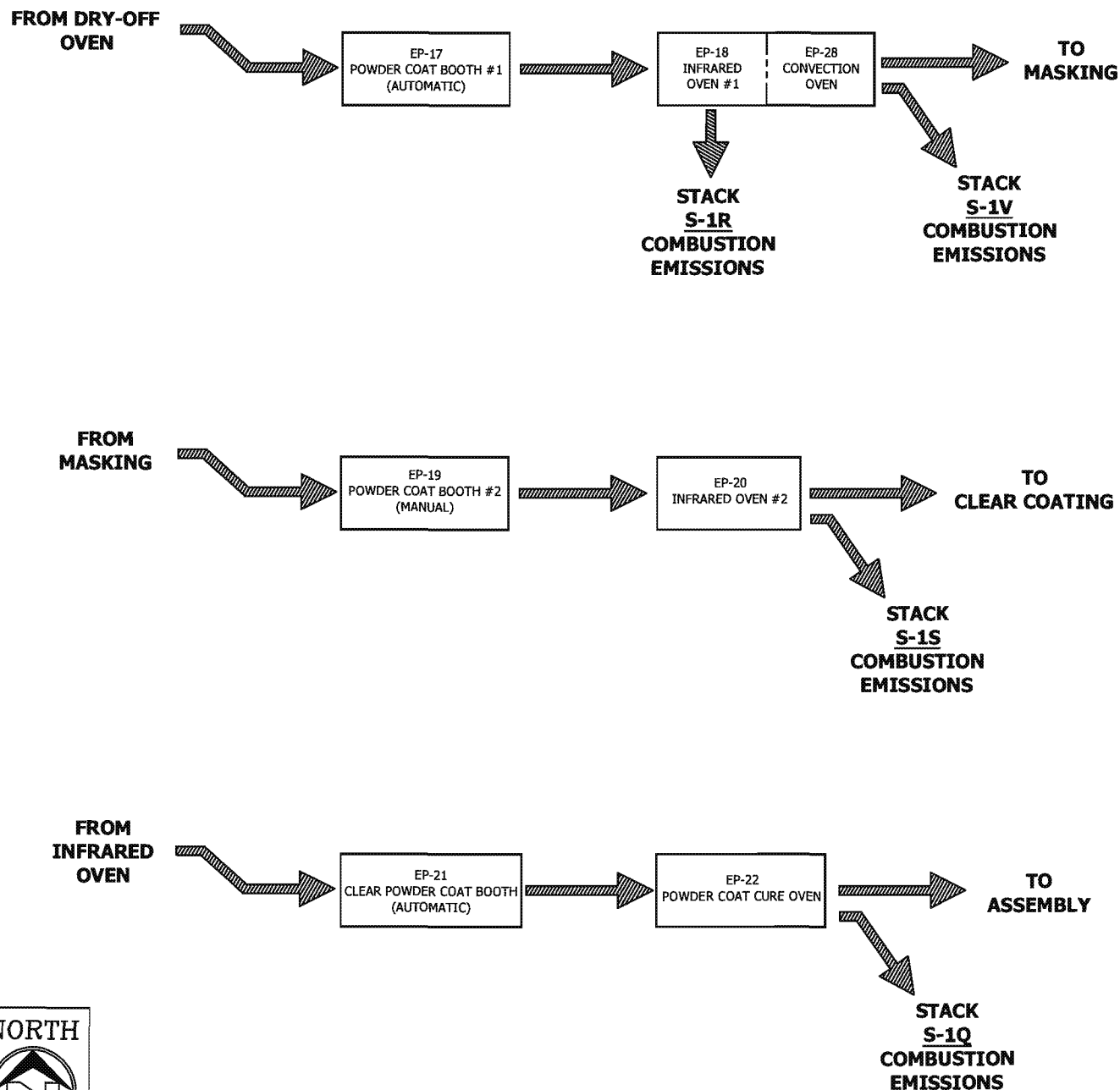
1455 E. Chestnut Expressway  
Springfield, MO 65802

## PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE  
**1.1g**

## TWO-TONED BOATS



CHECKED BY:  
S. ROBORDS

E.W.I. # 130012  
DRAWN BY: MEK  
JUN. 19, 2014

NOT-TO-SCALE



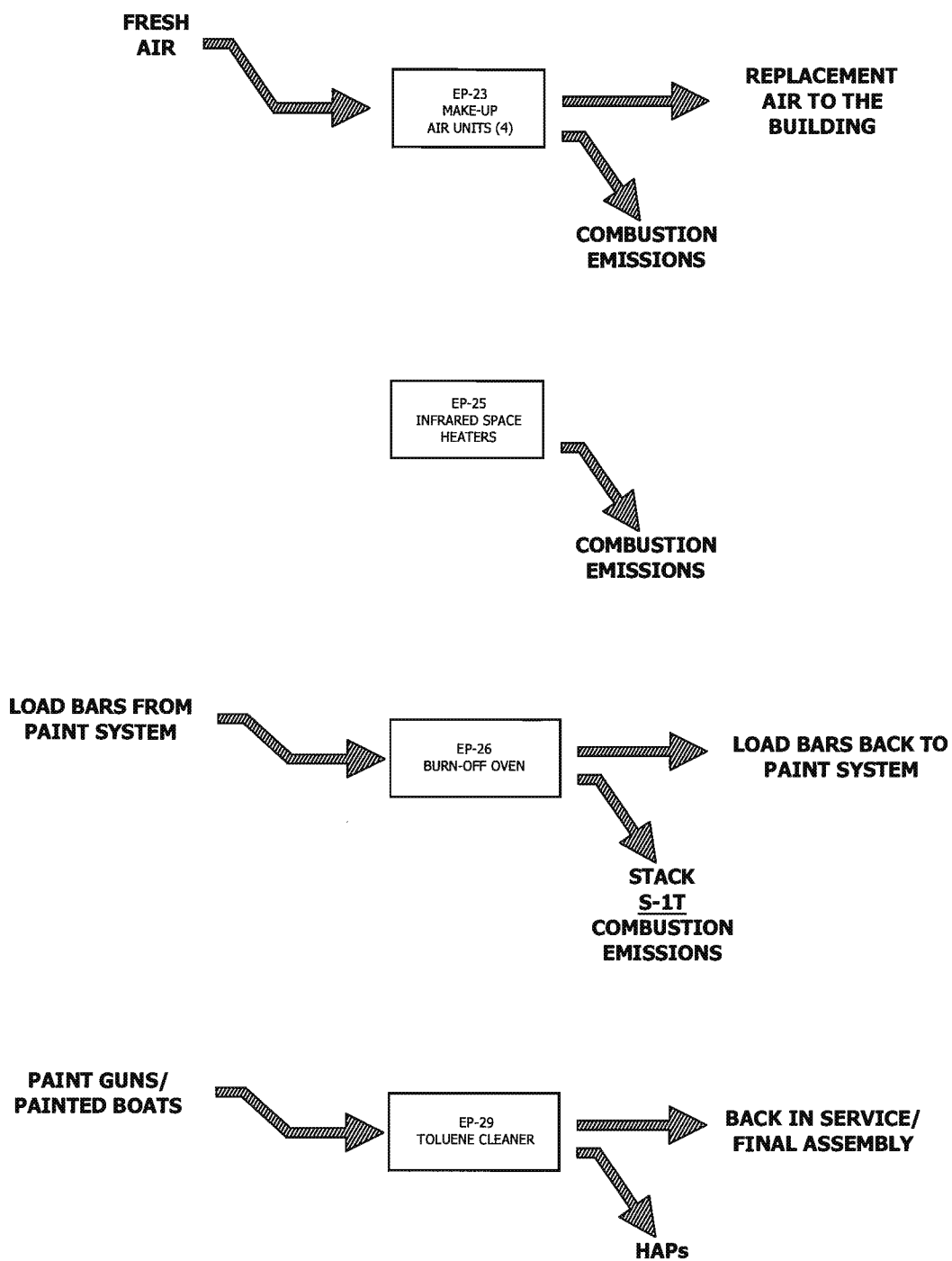
1455 E. Chestnut Expressway  
Springfield, MO 65802

### PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE

**1.1h**



CHECKED BY:  
S. ROBORDS

E.W.I. # 130012  
DRAWN BY: MEK  
JUN. 19, 2014

NOT-TO-SCALE



1455 E. Chestnut Expressway  
Springfield, MO 65802

## PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE

**1.1i**

**APPENDIX E**

**Construction Permit Updates**





June 25, 2014

Ms. Susan Heckenkamp  
Construction Permit Unit  
Air Pollution Control Program  
Missouri Department of Natural Resources  
1659 E. Elm Street  
Jefferson City MO 65101

RE: Modifications to Construction Permit 052013-001  
Tracker Marine – Lebanon Plant  
Installation No. 105-0046

Dear Ms. Heckenkamp:

Environmental Works, Inc. (EWI) is submitting modifications to the permit above on behalf of the Tracker Marine – Lebanon Plant (Tracker). These modifications are being submitted together with the Part 70 operating permit renewal, as outlined in a letter to MDNR submitted on May 16, 2014 (see Attachment A). Two copies of this letter and attachments are enclosed along with a filing fee of \$100.

This letter is being submitted to notify the Construction Permit Unit of additional equipment which was installed during the construction process. Potential emissions were calculated for this equipment and totals fall below *de minimus* thresholds (see Attachment B). Therefore a construction permit is not required.

A plasma cutter was added to Plant 1 and designated as EP-11(seg. 5). The maximum hourly design rate (MHDR) for this unit is 7.2 ° 1,000 inches cut per hour. Potential emissions of PM10 are calculated at 0.0005 tons/year (see Attachment B). Emissions are below *de minimus* levels.

The plasma cutter in Plant 2 was replaced with an identical unit, designated as EP-11(6). The MHDR for this unit is 11.1 ° 1,000 inches cut per hour. Potential emissions of PM10 are calculated at 0.0010 tons/year (see Attachment B). Emissions are below *de minimus* levels.

Allowable emissions of particulate matter were computed for the two new plasma cutters per 10 CSR 10-6.400 (Attachment C). Potential emissions fall well below allowable limits. Emissions were also calculated for the existing units since it was learned these units exhaust outdoors during the warmer months.

Robovent collectors were installed on EP-11(5), EP-11(6), and on an existing unit, EP-11(1). Specifications for the Robovent collectors are included as Attachment D.

4025 E. Main Street  
Jefferson City, MO 65101  
Phone: 660.667.1000  
Fax: 660.667.1001

201 South Greenbriar Ave.  
Jefferson City, MO 65101  
Phone: 660.667.1000  
Fax: 660.667.1001

777 E. Main

660.667.1000  
www.environmentalworks.com

## **APPENDIX A**

### **Letter to MDNR**



May 16, 2014

Susie Heckenkamp, Chief  
Construction Permit Unit  
Air Pollution Control Program  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102-0176

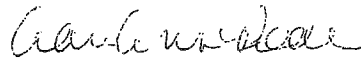
**RE: Modification Application for Construction Permit 052013-001  
Tracker Marine – Lebanon Plant  
Installation No. 105-0046**

Dear Ms. Heckenkamp:

On behalf of Tracker Marine, I am writing to inform you that Tracker Marine wishes to incorporate the new information from the construction permit into their upcoming Part 70 operating permit renewal application rather than submitting a separate modification application. The modification application would have been due by June 10, 2014, but an email from Nicole Weidenbenner offered the option of submitting the new information along with the permit renewal on June 26, 2014 (see attached). Tracker wishes to pursue this option.

Should you have any questions or concerns, please contact me.

Sincerely,  
**ENVIRONMENTAL WORKS, INC.**

  
AdriAnn Rode, REM  
Senior Project Manager

Attachment

C Kendall Hale, MDNR  
Nicole Weidenbenner, MDNR  
Dan Hoy, Bass Pro Shops  
Bobby Baker, Tracker Marine - Lebanon

## Susan Robords

---

**From:** Weidenbenner, Nicole <nicole.weidenbenner@dnr.mo.gov>  
**Sent:** Wednesday, September 25, 2013 12:33 PM  
**To:** Susan Robords  
**Cc:** AdriAnn Rode; April Brennan  
**Subject:** RE: Clarification needed on deadline

Susan,

The modification application to incorporate the new equipment from the construction permit needs to be received by our office by June 10, 2014.

However, the current Part 70 Operating Permit has an expiration date of 12/26/15. Part 70 Operating Permit renewal applications may be received up to 18 months prior to the permit expiration date, which is 6/26/14.

Since these dates are so close to each other, you have a choice.

1. You may submit only the modification application by June 10, 2014 and wait to submit the renewal application until 6/26/15; or
2. You may submit only a renewal application, with the new information from the construction permit, on 6/26/14.

If you have questions, or need assistance with either application, please contact me

Thanks,  
Nicole

Nicole Weidenbenner, P.E.  
Missouri Department of Natural Resources  
Air Pollution Control Program  
P.O. Box 176  
Jefferson City, MO 65102  
Phone: 573-751-4817

**From:** Susan Robords [<mailto:robords@environmentalworks.com>]  
**Sent:** Wednesday, September 25, 2013 10:53 AM  
**To:** Weidenbenner, Nicole  
**Cc:** AdriAnn Rode; April Brennan  
**Subject:** Clarification needed on deadline

RE: Installation no. 105-0046

Hello,

Environmental Works assisted Tracker Marine in obtaining a construction permit to allow modifications to their boat plant in Lebanon.

Under the Review Summary of Construction Permit 052013-001, one of the bulleted items states that "Modification to the Part 70 Operating Permit application is required for this installation within 1 year of equipment startup" (see attached). The date of equipment startup was June 10, 2013.

Am I correct in assuming that the operating permit application needs to be submitted by June 10, 2014? Or is the modified permit supposed to be in place by the anniversary date, in which case the application would need to be submitted at least 6 months before then (December 2013)?

Thank you.

Susan J. Robords  
Environmental Scientist  
**Environmental Works, Inc.**  
1455 E. Chestnut Expressway  
Springfield, Missouri 65802  
P: 417-890-9500  
F: 417-823-9659  
[www.environmentalworks.com](http://www.environmentalworks.com)

**APPENDIX B**

**Potential to Emit Calculations**

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-10(3) Paint Booth #3 - Dual Booth  
 SCC Code: 40200101  
 Control Efficiency of PM10 97.00%  
 Solids Transfer Efficiency 65.00%

**1. Maximum Hourly Design Rate**

<b>Maximum Hourly Design Rate - Touchup of Powder-Coated Boats</b>			
30 Boats	1 shift	0.75 Gallons	= 2.25 Gallons/Hour
1 shift	10 hours	1 Boat	

0.75 gallons per boat  
 2.25 gallons per hour

<b>Maximum Hourly Design Rate - Camouflage Painting of Jon Boats</b>			
10 Boats	1 shift	0.85 Gallons <sup>2</sup>	= 0.85 Gallons/Hour
1 shift	10 hours	1 Boat	

0.85 gallons per boat  
 0.85 gallons per hour

## 2. PTE Calculations

### Sum of PTE for both processes

Process	VOC (tons/yr)	HAPs (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)
Touch-up Painting	54.50	71.83	0.36	0.36
Camouflage Painting	39.99	12.08	0.22	0.22
<b>Total PTE (tons/yr)</b>	<b>94.48</b>	<b>83.91</b>	<b>0.58</b>	<b>0.58</b>

### Touch-up Painting

Paint	Density (lbs/gal)	VOC content (lbs/gal)	Max HAP content (%)	Solids content (lbs/gal)	VOC emissions (tons/yr)	HAP emissions (tons/yr)	PM10 emissions (tons/yr)	PM2.5 emissions (tons/yr)
PPG Touchup Paint - all colors	8.01	5.53	91.00%	2.48			0.26	0.26
Touchup Paint - clear	7.84	4.41	0.00%	3.43	43.44	0.00	0.36	0.36
<b>Sum PTE (tons/yr):</b>					<b>54.50</b>	<b>71.83</b>	<b>0.36</b>	<b>0.36</b>

### Camouflage Painting

Paint	Density (lbs/gal)	VOC content (lbs/gal)	Max HAP content (%)	Solids content (lbs/gal)	VOC emissions (tons/yr)	HAP emissions (tons/yr)	PM10 emissions (tons/yr)	PM2.5 emissions (tons/yr)
Primer, Base, Wash, Pewter	8.26	5.94	22.50%	2.32				
Charcoal Green Camouflage	8.09	4.78	17.00%	3.31	17.80	5.12	0.13	0.13
Marsh Grass Camouflage	8.36	4.80	16.00%	3.56	17.87	4.98	0.14	0.14
Mud Brown Camouflage	8.15	4.80	17.00%	3.35	17.87	5.16	0.13	0.13
<b>Sum PTE (tons/yr):</b>					<b>39.99</b>	<b>12.08</b>	<b>0.22</b>	<b>0.22</b>

**Note 1:** Primer information from 2009 construction permit application; camouflage paint information from plant.

**Note 2:** Sum of paint and primer per boat

Maximum VOC, HAP and PM10 emissions from the different types of coatings applied in the paint booth. The PTE from the paint booth is the sum of these maximum values for each pollutant.



### 3. HAPs

#### Touch-up Painting

Touch-up Paints	HAPs	Percentage
Touch-up paint, all colors	Xylene	60.00%
	Ethylbenzene	13.00%
	Toluene	7.00%
	m-xylene	5.00%
	Methyl isobutyl ketone	5.00%
	p-xylene	1.00%

#### Camouflage Painting

Primer/Paint	HAPs	Percentage
Primer, Base, Wash, Pewter	Methyl Isobutyl Ketone (MIBK)	8.00%
	Toluene	7.50%
	Zinc Chromate	7.00%
Charcoal Green Camouflage	Xylene	17.00%
Marsh Grass Camouflage	Xylene	12.00%
	Ethylbenzene	4.00%
Mud Brown Camouflage	Xylene	17.00%

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-11(5) Plasma Cutter  
 SCC Code: 30903008  
 Control Efficiency of PM10 99.90%

Maximum Hourly Design Rate				
2,400 inches cut	3.0 Boats cut	1	= 7.2 1,000 in. cut/hour	
1 Boat	1 hour	1,000		

The potential to emit PM10 is calculated as follows:

7.2 1,000 inches	0.0162 lbs PM10	1 ton	8,760 hours	*(1- 0.999 control efficiency)	0.0005 tons/year
hour	1,000 inches cut	2,000 lbs	year		

The potential to emit PM2.5 is calculated as follows:

3.0 boats cut	398 lbs Al	8760 hours	0.0860 lbs PM2.5	1 ton	*(1- 0.999 control efficiency)	0.0002 tons/year
1 hour	1 boat	year	2000 lbs	2000 lbs		

**Notes:**

The emission factor for EP-11(5) was derived from a 1994 study by the American Welding Society (published in Sweden), since there is no published emission factor in AP-42, the factor information retrieval (FIRE), or elsewhere. The emission factor in the welding study is 0.1622 lbs <sub>PM10</sub>/1,000 inches cut for 1" aluminum thickness. The thickness of aluminum cut at plasma cutter #5 is 0.1019 inches thick and the emission factor is calculated as follows:

$(0.1622 \text{ lbs PM}_{10} / [1,000 \text{ inches cut} * 1 \text{ inch thickness}]) * 0.100 \text{ inch thickness} = 0.0162 \text{ lbs PM}_{10} / 1,000 \text{ inches cut.}$

The emission factor for PM2.5 is from CEIDARS TABLE-Fabricated Metals, Arc Welding, Oxy Fuel, Copper, Zinc, Bath.

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-11(6) Plasma Cutter  
 SCC Code: 30903008  
 Control Efficiency of PM10 99.90%

Maximum Hourly Design Rate				
3,700 inches cut	3.0 Boats cut	1	= 11.1 1,000 in. cut/hour	
1 Boat	1 hour	1,000		

The potential to emit PM10 is calculated as follows:

11.1 1,000 inches	0.020275 lbs PM10	1 ton	8,760 hours	*(1- 0.999 control efficiency)	0.0010 tons/year
hour	1,000 inches cut	2,000 lbs	year		

The potential to emit PM2.5 is calculated as follows:

3.0 boats cut	398 lbs Al	8760 hours	0.0860 lbs PM2.5	1 ton	*(1- 0.999 control efficiency)	0.0002 tons/year
1 hour	1 boat	year	2000 lbs	2000 lbs		

**Notes:**

The emission factor for EP-11(6) was derived from a 1994 study by the American Welding Society (published in Sweden), since there is no published emission factor in AP-42, the factor information retrieval (FIRE), or elsewhere. The emission factor in the welding study is 0.1622 lbs <sub>PM10</sub>/1,000 inches cut for 1" aluminum thickness. The thickness of aluminum cut at plasma cutter #6 is 0.125 inches thick and the emission factor is calculated as follows:

$(0.1622 \text{ lbs } PM_{10}/[1,000 \text{ inches cut} * 1 \text{ inch thickness}]) * 0.125 \text{ inch thickness} = 0.020275 \text{ lbs } PM_{10}/1,000 \text{ inches cut.}$

The emission factor for PM2.5 is from CEIDARS TABLE-Fabricated Metals, Arc Welding, Oxy Fuel, Copper, Zinc, Bath.

**Potential to Emit Calculations**  
**Tracker Marine Group - Lebanon Facility**  
**Operating Permit Renewal**  
**June 2014**

Emission Unit: EP-26 Burn-off Oven  
 SCC Code: 10200603  
 Control Efficiency: 99.90%  
 MHDR: 0.875 MMBTU/hr

Emission Factors from FIRE (<10 mmBTU/hr heat input):

PM<sub>10</sub>: 7.6 lbs/mmescf  
 PM<sub>2.5</sub>: 7.6 lbs/mmescf  
 SO<sub>x</sub>: 0.6 lbs/mmescf  
 NO<sub>x</sub>: 100.0 lbs/mmescf  
 VOC: 5.5 lbs/mmescf  
 CO: 84.0 lbs/mmescf

		Emissions (tons/yr)	Emissions (lbs/day)
PM <sub>10</sub> :	$(7.6 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (0.875 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.000	0.000
PM <sub>2.5</sub> :	$(7.6 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (0.875 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.000	0.000
SO <sub>x</sub> :	$(0.6 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (0.875 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.000	0.000
NO <sub>x</sub> :	$(100 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (0.875 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.000	0.002
VOC:	$(5.5 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (0.875 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.000	0.000
CO:	$(84 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (0.875 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.000	0.002

Potential to Emit Calculations  
Tracker Marine Group - Lebanon Facility  
Operating Permit Renewal  
June 2014

Emission Unit: EP-28 Convection Oven  
SCC Code: 10200603  
MHDR: 2.4 MMBTU/hr

Emission Factors from FIRE (<10 mmBTU/hr heat input):

PM<sub>10</sub>: 7.6 lbs/mmescf  
PM<sub>2.5</sub>: 7.6 lbs/mmescf  
SO<sub>x</sub>: 0.6 lbs/mmescf  
NO<sub>x</sub>: 100.0 lbs/mmescf  
VOC: 5.5 lbs/mmescf  
CO: 84.0 lbs/mmescf

		Emissions (tons/yr)	Emissions (lbs/day)
PM <sub>10</sub> :	$(7.6 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (2.4 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.080	0.438
PM <sub>2.5</sub> :	$(7.6 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (2.4 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.080	0.438
SO <sub>x</sub> :	$(0.6 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (2.4 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.006	0.035
NO <sub>x</sub> :	$(100 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (2.4 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	1.051	5.760
VOC:	$(5.5 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (2.4 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.058	0.317
CO:	$(84 \text{ lbs/mmescf}) * (1 \text{ mmescf}/1000 \text{ mmBTUs}) * (2.4 \text{ mmBTUs}/\text{hour}) * (8760 \text{ hours}/\text{year}) * (1 \text{ ton}/2000 \text{ lbs}) =$	0.883	4.838

## **APPENDIX C**

### **Restriction of Emission of Particulate Matter Calculations**

# ATTACHMENT

## 10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes

Allowable PM<sub>10</sub> Emission Formula (10 CSR 10-6.400):  $E = 4.10P^{0.67}$

where,

E = rate of emission in pounds per hour (lbs/hr)  
P = process weight rate in tons per hour (tons/hr).

The following tables summarizes calculations for allowable and potential emissions for each applicable emission point affected by 10 CSR 10-6.400.

Emission Point ID	Maximum Hourly Throughput (1000 inches/hr)	Maximum Hourly Throughput (P) (tons/hr)	Allowable PM <sub>10</sub> Emissions (E) (lbs/hr)	Density (lbs/gal)	PM <sub>10</sub> Emissions Factor (lbs/1000 inches)	% Transfer Efficiency	Control Efficiency	Potential PM <sub>10</sub> Emissions (lbs/hour)
EP-11 (seg.1)	2.626	0.597	2.90	N/A	0.020275	N/A	0.999	0.00005
EP-11 (seg.2)	12.51	0.754	3.39	N/A	0.0165	N/A	0.999	0.00021
EP-11 (seg.3)	7.4	0.398	2.21	N/A	0.020275	N/A	0.999	0.00015
EP-11 (seg.4)	11.1	0.597	2.90	N/A	0.020275	N/A	0.999	0.00023
EP-11 (seg.5)	7.2	0.597	2.90	N/A	0.0162	N/A	0.999	0.00012
EP-11 (seg.6)	11.1	0.597	2.90	N/A	0.020275	N/A	0.999	0.00023

EP-11(5) = Additional plasma cutter in Plant 1.

EP-11(6) = Replacement plasma cutter in Plant 2. (Replaces EP-11(4))

EP-11(1): MHDR = 875.2 in. cut/1 boat \* 3 boats cut/hour = 2,626 inches cut per hour or 2.626 1,000 inches cut per hour  
2,626 inches/hr \* 1 boat/875.2 inches \* 398 lbs/boat \* 1 ton/2,000 lbs \* 10 hour/day\*4 days/week \* 50 weeks/year = 1,194 tons/year

EP-11(2): MHDR = 6255 in. cut/1 boat \* 2 boats cut/hour = 12,510 inches cut per hour or 12.51 1,000 inches cut per hour  
12,510 inches/hr \* 1 boat/6255 inches \* 754 lbs/boat \* 1 ton/2,000 lbs \* 10 hour/day\*4 days/week \* 50 weeks/year = 1,508 tons/year

EP-11(3): MHDR = 3700 in. cut/1 boat \* 2 boats cut/hour = 7,400 inches cut per hour or 7.4 1,000 inches cut per hour  
7,400 inches/hr \* 1 boat/3700 inches \* 398 lbs/boat \* 1 ton/2,000 lbs \* 10 hour/day\*4 days/week \* 50 weeks/year = 796 tons/year

EP-11(4): MHDR = 3700 in. cut/1 boat \* 3 boats cut/hour = 11,100 inches cut per hour or 11.1 1,000 inches cut per hour  
11,100 inches/hr \* 1 boat/3700 inches \* 398 lbs/boat \* 1 ton/2,000 lbs \* 10 hour/day\*4 days/week \* 50 weeks/year = 1,194 tons/year

EP-11(5): MHDR = 2400 in. cut/1 boat \* 3 boats cut/hour = 7,200 inches cut per hour or 7.2 1,000 inches cut per hour  
7,200 inches/hr \* 1 boat/2400 inches \* 398 lbs/boat \* 1 ton/2,000 lbs \* 10 hour/day\*4 days/week \* 50 weeks/year = 1,194 tons/year

EP-11(6): MHDR = 3700 in. cut/1 boat \* 3 boats cut/hour = 11,100 inches cut per hour or 11.1 1,000 inches cut per hour  
11,100 inches/hr \* 1 boat/3700 inches \* 398 lbs/boat \* 1 ton/2,000 lbs \* 10 hour/day\*4 days/week \* 50 weeks/year = 1,194 tons/year

## **APPENDIX D**

### **Specifications for Plasma Cutter Collectors**



## Model PA-8M-21000-16t-H

Media Area: Comparable to 8,192 sq. ft.

Motor: Marathon High Efficiency 25HP 3600 RPM

Full Amps: 30.0 @ 460 Volts

Wheel: Backward Inclined Airfoil

Airflow: 8,000 CFM @ 10" S.P.

Noise Level: 72 dB(A) @ 5' \*

Filter Type: (16) CF-14D52-ENX-SQFL

Filter Material: (6) Heavy Duty Metal Mesh MM-17402

(3) Heavy Duty Baffle FB-24242

Valve: (16) 1" Electronically Actuated Solenoid

2.6 SCFM On-Line Pulse; 15.6 SCFM Off-Line Pulse @80PSI

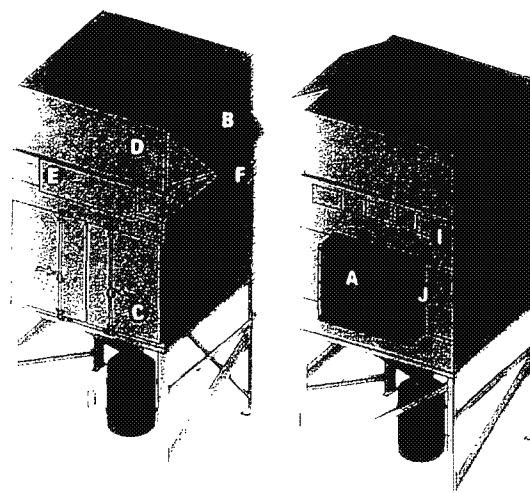
Integral Acoustical Sound Plenum with Low Frequency Bass  
Trap Dampening

Minimum 45"

5280 lbs.

90" W x 78" D x 189" H

Included



Inlet Area

Clean Air Exhaust

Filter Access Door

Motor/Exhaust  
Plenum

Electrical Enclosure

Compressed Air  
& Solenoid Access

Compressed Air  
Connection 1" NPT

Hopper & Long Legs

Blower Access  
(not shown, on back)

Spark Arrestor  
Access

\* Noise level measurements were taken under free field conditions with an ambient noise level of 45 dB and do not reflect influences of acoustical characteristics due to operational environments.

### Standard Plaser Features

**SparkOut**: Plaser's unique spark arrestor filter

**PowerFlex**: Pulsing System to deliver constant pulsing pressure across entire filter

**AutoSaver**: The Auto On/Off Feature that Reduces Energy Cost by Running the Filtration System ONLY when the Cutting System is Turned On

**E-Pad**: Control Board that Controls the Filtration System Functions

**SafeSensor**: Particle Monitoring Device

**Endurex Media**: A Multi-Stage PTFE Membrane that Provides Higher Efficiency Filtration than traditionally designed filter media

**Heavy Duty Construction**: 1/2" Thick Steel Construction

**Nema 4x Super Seal Doors and Control Panel Enclosure**

**Acoustical Sound Plenum**

**BEST WARRANTY IN THE INDUSTRY**: 10 years on the motor, 5 years on standard components, 1 year on optional components. See warranty document for details.

### Plaser Options

**E-Drive**: Automatically adjust the Airflow via a Flow Monitor and VFD to extend Filter Life and Reduce Energy Cost by up to 30%

**Supprex-200**: A Completely Engineered Fire Suppression System Activated by Smoke and Heat Creating a Safer Work Environment

**Discharge Fire Damper**

**HEPA After Filters**

**Inlet Transitions**

**Duct Kits**

**Superseal Hopper Gate**

**230 or 600 Volt Options**

**Roll-Out Dust Bin**

**Explosion Vents**

**Turnkey Packages Including Installation, Ductwork and Commissioning**

**Service Platforms/Ladders**

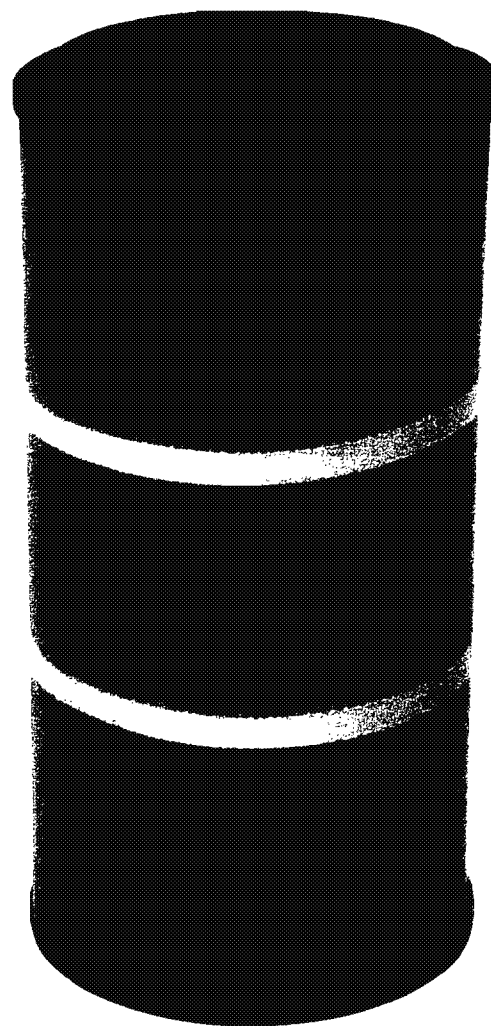
**Severe Condition Finish**

## ENDUREX

### Ultra Efficient Cartridge Filter

The Endurex™ E16 filter media uses nanofiber technology to achieve higher efficiency filtration to deliver longer filter life, cleaner air and greater energy savings. The Endurex filters feature wide pleat spacing which allows thorough pulse cleaning of microscopic and fibrous particulate from plasma and laser cutting applications. The Endurex media, with its tight uniform pore size does not allow particulate to embed into the media substrate as with other technologies and will thus stabilize at a lower pressure drop making it the perfect media for tough, heavy loading applications where HEPA filtration efficiencies are required.

Basket:	0.625 x 0.625 Neoprene
Pleat Depth:	2"
Filter Media:	High-Efficiency Expanded PTFE Membrane
Inner Cage:	Galvanized Expanded Metal
Outer Support:	2 Outer Support Bands
Potting Material:	Urethane
End Cap Depth:	0.3"
Efficiency:	99.9 @ .3 micron
Max. Operating Temp:	275° F



#### Endurex Filter Media Technical Specifications:

	UNITS	NOMINAL VALUE		UNITS	NOMINAL VALUE
Basis Weight	lb/sq. ft.	1.21	Corrugations	1/2"	1.370
Weighted Efficiency	%	99.99	Max. Pore Size (Bubble Point)	1st. 39" (ins. of H2O)	8.70
Frazier Air Flow	CFM/sq.ft. @ 0.5 in H2O	16.9	Mullen Burst Strength	PSI	287
Caliper	Mils	39.75	Volatiles	%	6.6%

Due to continued engineering, all specifications are subject to change without notice. ©2011 RoboVent Product Group, Inc.

## **APPENDIX E**

### **Emission Unit Numbering**

### Emission Unit Designations

Emission Unit Number	Emission Unit Description	Proposed Emission Unit Numbers - May 2013 Construction Permit	Status as of June 2014
EP - 01A	GLUING OPERATIONS (Fugitive - Assembly Line)	EU - 02A	Active
EP - 01B	GLUING OPERATIONS (HEPA Filter)	EU - 02B	Active
EP - 03A	TOLUENE THINNER		Replaced by Acid Wipedown during 2012 / Dismantled
EP - 05	KEROSENE SPACE HEATERS		Removed
EP - 06A Working Loss	GASOLINE STORAGE TANK	EU - 03A Working Loss	Active
EP - 06B Breathing Loss		EU - 03B Breathing Loss	
EP - 07A Working Loss	DIESEL STORAGE TANK	EU - 04A Working Loss	Active
EP - 07B Breathing Loss		EU - 04B Breathing Loss	
EP - 08A	WELDING - WIRE USAGE	EU - 05A	Active
EP - 08B	WELDING - ROD USAGE	EU - 05B	Active
EP - 09	PLYWOOD CUTTING (SAWDUST)	EU - 06	Active
EP - 10(1)	PAINT BOOTH #1		Dismantled
EP - 10(2)	PAINT BOOTH #2	EU - 07	Dismantled
EP - 10(3)	PAINT BOOTH #3	EU - 08	Active / Retained [Dual Booth]
EP - 10(4)	PAINT BOOTH #4	EU - 09	Dismantled
EP - 10A(1)	PAINT BOOTH #1 TOLUENE WIPE		Replaced by Acid Wipedown during 2012 / Dismantled
EP - 10A(2)	PAINT BOOTH #2 TOLUENE WIPE		
EP - 10A(3)	PAINT BOOTH #3 TOLUENE WIPE		
EP - 10A(4)	PAINT BOOTH #4 TOLUENE WIPE		
EP - 11(1)	PLASMA CUTTER #1 - 875 in./boat	EU - 11	Active
EP - 11(2)	PLASMA CUTTER #2 - 6,255 in./boat	EU - 10	Active
EP - 11(3)	PLASMA CUTTER #3 - 3,700 in./boat	EU - 12	Active
EP - 11(4)	PLASMA CUTTER #4 - 3,700 in./boat	EU - 13	Replaced by Plasma Cutter #6
EP - 11(5)	PLASMA CUTTER #5 - 2,400 in./boat		New EP - Installed 2013
EP - 11(6)	PLASMA CUTTER #6 - 3,700 in./boat		New EP - Installed 2014
EP - 12(1)	Drying Oven for Paint Booth #1		Dismantled
EP - 12(2)	Drying Oven for Paint Booth #2	Will be removed	Dismantled
EP - 12(3)	Drying Oven for Paint Booth #3	EU-08A	Active / Retained
EP - 12(4)	Drying Oven for Paint Booth #4	EU - 09A	Dismantled
EP - 13	FLOTATION FOAMING	EU - 01	Active
EP - 14	PONTOON BOAT TOUCH UP SPRAY PAINTING	EU - 14	Active
EP - 15	ACID WASH SYSTEM	EU - 15	Active
EP - 16	DRY-OFF OVEN	EU - 16	Active
EP - 17	POWDER COAT BOOTH #1	EU - 17	Active
EP - 18	INFRARED OVEN #1	EU - 18	Active
EP - 19	POWDER COAT BOOTH #2	EU - 19	Active
EP - 20	INFRARED OVEN #2	EU - 20	Active
EP - 21	CLEAR POWDER COAT BOOTH	EU - 21	Active
EP - 22	POWDER COAT CURE OVEN	EU - 22	Active
EP - 23	MAKE-UP AIR UNITS (4)	EU - 23	Active
EP - 24	BLANK (Formerly Make-Up Air Unit #2)	EU - 24	
EP - 25	INFRARED SPACE HEATERS (formerly propane)	EU - 25	Active
EP - 26	BURN-OFF OVEN	EU - 26	Active
EP - 27	ACID WIPEDOWN	EU - 27	Replaced by Acid Wash System during 2013
EP - 28	CONVECTION OVEN		Active
EP - 29	TOLUENE CLEANER		Active

Removed/Dismantled/Inactive

## **APPENDIX F**

### **Specifications for Spray Paint Collector**

# RoboVent

## Portable Series

**Filter Media:** 256 square feet

**Filter Media:** Roughing filter, 95% ASHRAE filter and charcoal after filter for odor mitigation with HEPA final filter to achieve 99.9% @ .3 micron.

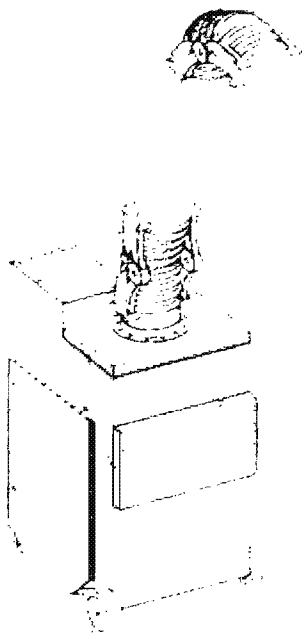
**Motor/Blower Configuration:** Air Foil, Direct Drive, Silenced

**Silencing:** Built-In Acoustical Lining

**Weight:** 420-445 Lbs.

**Electrical Controls:** Manual On/Off switch

Motor/Blower Configuration	CFM @ IN S.P.	Air to Cloth Ratio	F.L. Amps @ 460V
1.5 HP, 110V/ 60 Hz	1200 @ 4.5"	4.7:1	3.0



[www.robovent.com](http://www.robovent.com)

888.ROBOVENT (762.6836)

This system is covered by one or more of the following patents: #6,758,875; #4,610,704 and other patents pending. Due to continued engineering, all specifications are subject to change without notice. ©2012 RoboVent Product Group, Inc. 3/23/12 Rev 3

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## **APPENDIX G**

### **Burn-off Oven Specifications & Photographs**



APPLICAT71-1

MAY 27, 1994

2677 FREWOOD DRIVE  
DALLAS, TEXAS 75220-2584  
U.S.A. (214) 358-1539  
FAX (214) 358-3379

NOTICE TO STATE PERMITTING AGENCIES

DISPERSION MODELING INFORMATION

For Controlled Pyrolysis Furnaces With J-121 Burners

THIS BOOKLET CONTAINS INFORMATION ON CONTROLLED PYROLYSIS<sup>™</sup> CLEANING FURNACES USED BY MANY INDUSTRIES TO CLEAN NON-HAZARDOUS HYDROCARBON COATINGS SUCH AS PAINT, GREASE, OIL, PLASTICS, ETC. FROM METAL PARTS.

THE CLEANING FURNACE IS LIMITED TO PROCESSING A MAXIMUM 20 POUNDS (10 KG.) PER HOUR OF COMBUSTIBLE MATERIAL USING A MAXIMUM COMBUSTION ENERGY INPUT OF 950,000 BTU/HOUR, THEREFORE THE AMOUNT OF EMISSIONS IS SMALL ENOUGH THAT SOME STATES EXEMPT PERMITTING.

THE AVERAGE EMISSIONS FROM THE FURNACE ARE AS FOLLOWS:

PARTICULATE MATTER: 0.027 LBS/HR= 54.8 POUNDS PER YEAR= 0.003354 G/SEC= 4.6060 TO 6.2198 MICROGRAMS/CU. METER= 6.2% OF REGULATION 308 SCHEDULE 1 MAXIMUM OF 100 MICROGRAMS/CU. METER.

NITROGEN OXIDES 0.0542 LBS/HR= 113 POUNDS PER YEAR= 0.0068 GM/SEC = 9.38 TO 12.68 MICROGRAMS/CU. METER= 2.5% OF REGULATION 308 SCHEDULE 1 MAXIMUM OF 500 MICROGRAMS/CU. METER.

HYDROCARBONS 0.0348 LBS/HR= 72.4 POUNDS PER YEAR= 0.004394 GM/SEC= 65 PPM IN THE STACK= 13% OF REGULATION 308 SCHEDULE 1 MAXIMUM 500 PPM IN THE STACK.

SULPHUR OXIDES 0.0036 LBS/HR= 7.4 POUNDS PER YEAR= 0.000454 GM/SEC = 0.6234 TO 0.8418 MICROGRAMS/CU. METER= 0.10% OF REGULATION 308 SCHEDULE 1 MAXIMUM OF 830 MICROGRAMS/CU. METER.

CARBON MONOXIDE 0.10 LBS/HR= 210.0 POUNDS PER YEAR= 0.012612 GM/SEC= 17.32 TO 23.39 MICROGRAMS/CU. METER= 0.4% OF REGULATION 308 SCHEDULE 1 MAXIMUM = 6000 MICROGRAMS/CU. METER.

(1) EMISSIONS PER YEAR BASED ON OPERATING 8 HOURS/DAY, 5 DAYS/WEEK, 52 WEEKS/YEAR.

(2) MAXIMUM GROUND LEVEL CONCENTRATIONS BASED ON A FURNACE INSTALLED IN THE CENTER OF A PLOT 30 FEET (10 METERS) SQUARE (X=5M; Y=5M); STACK HEIGHT 17 FEET (5.2 METERS); STACK DIAMETER 10 INCHES (0.254 METERS); EXIT TEMPERATURE 1400° F. (769° C.) AND COMPUTER CALCULATED USING "MAXIMUM GROUND LEVEL CONCENTRATION PROGRAM", VERSION 2, COPYRIGHT (C) ALPHA COMPUTER SERVICE, SUPPLIED BY ONTARIO, CANADA, MINISTRY OF THE ENVIRONMENT.

THIS BOOKLET ALSO CONTAINS PERMIT MATERIAL INCLUDING COPIES OF LABORATORY TEST REPORTS. FOR ADDITIONAL INFORMATION, PLEASE CONTACT THE FACTORY.  
TELEPHONE 214-358-1539 FAX 214-358-3379

ED\_006001\_00000527-00108



# POLLUTION CONTROL PRODUCTS CO.

8 FILE -18 OF 154VF  
AL S XAS / 7 4  
S 4 156 59  
FAX 214 553-5779  
sale pcpr inc ne u  
sr pcpr inc ne  
ie  
w e.

11/8/2012

Bobby Baker  
Tracker Marine  
Lebanon, MO 65536

Dear Bobby:

At your request, Pollution Control Products Co. is pleased to quote the following  
Controlled Pyrolysis® Furnace.

## 1 - Model PRC-340 RateControlled™ Furnace

### Furnace Includes:

Five 3-foot sections of insulated stainless steel chimney, adjustable roof flashing,  
storm collar with weatherproof sealant tape, rain cap, instruction manual,  
Standard PTR/PRC Hanging Cart, and exterior cart tracks.

### OVEN SPECIFICATIONS:

Dimensions	Width	Depth	Height
Inside	84"	88"	84"
Footprint	109"	121"	98"
Usable Inside Cart	75"	84"	68"

Electrical	115V / 60 Hz / 20 AMP / 1 PH
Natural Gas	875,000 BTU/Hr. Pressure 11" WC min. & 15" WC max.
Water	7 gpm @ 40 PSI min. & 100 PSI max.

## **Exclusive Features of the PRC RateControlled™ Furnace**

- **Patented Controlled Pyrolysis® System:**  
As the oven thermally breaks down the organic material on the parts, a large amount of volatile smoke is created. The oven has a detection system that automatically monitors the afterburner (stack) temperature. As smoke evolves from the parts, it enters the afterburner chamber where it is incinerated in the afterburner flame. The burning of this smoke creates heat, which causes the afterburner temperature to increase. When enough smoke is entering the afterburner to reach its set-point, the water sprays are activated to slow down the rate of smoke evolution.
- **Pyrolysis/Oxidation Control System:**  
Provides an oxygen-limited, inert atmosphere inside the furnace while the paint or other organic material vaporizes off the parts into combustible smoke and pyrolysis gases. This virtually eliminates the possibility of the parts catching on fire inside of the furnace. Once most of the organic material has vaporized off of the parts, the control system automatically allows the oxygen level in the furnace to increase in order to completely oxidize any remaining carbon or char residues off of the parts.
- **Steel Combustion Chamber Guards:**  
A heavy-duty steel barrier is built around the upper and lower combustion chambers to protect from damage. The guards are designed to allow for easy access to the chamber itself for standard maintenance.
- **Commercial Gas Burners:**  
Furnace is equipped with Incinomite "Incinerator Gas Burners" designed specifically for incinerator and other similar applications. Features include quiet motor-driven high-output blower, superior no-clog nozzle design, easy maintenance, and rugged heavy-duty construction. Each burner is equipped with a patented automatic self-cooling system that inhibits burner damage from heat backup. All flame-safeguard components and associated wiring are located outside of the blast tube and blower housing, away from destructive heat. The blast tube contains only electrodes that provide ignition and flame detection. There is nothing to clog and no wires to burn.
- **5-Layer Wall Protection:**  
Corrosion-resistant barrier 1/8" thick is applied to furnace walls prior to installing insulation, adding years to the useful life of the furnace. A Perforated Steel Liner protects the insulation. Walls are constructed of 14 GA steel and reinforced by structural angles. 10 GA steel on front door(s) and relief door(s).

- **Diagnostic Panel:**  
Monitors the furnace components and quickly alerts operators of any abnormalities.
- **Digital Temperature and Limit Controllers:**  
Two microprocessor-based digital controllers monitor the furnace and afterburner temperature and control operation. A microprocessor-based digital Limit Controller shuts off and locks out the bottom burner if the furnace temperature exceeds a pre-set limit.
- **UL Listed Industrial Control Panel:**  
Control panel UL Listed & marked in accordance with UL508A for Industrial Control Panels.
- **Primary AND Back-Up Suppression Systems:**  
Two independent suppression systems control temperatures in the oven and prevent over-heating the load.
- **Floor:**  
Floor insulated with low maintenance castable refractory insulation.
- **EPA Permitting Assistance:**  
At customer's request, we will fill out all air quality permit applications required and supply all necessary stack test data and supporting documentation. We have ovens in all 50 states, of which many are "Permit Exempt."
- **Advanced RateControlled™ System:**  
This system monitors the RATE of temperature increase in both the furnace and the afterburner. Water suppression sprays immediately to control any overheat detected. This is automatic and there are no menus for the operator to select. The allowable RATE, programmed at the factory, does not require changes regardless of the size of the load or the type of paint/powder being removed.
- **Automatic Timing Cycle:**  
The oven self-adjusts cleaning time for varying load sizes. Just press the start button; the furnace evaluates the amount of combustible material and determines the appropriate cleaning cycle length each time. This eliminates operator input, saves gas, and saves time.
- **Rapid Fire Afterburner:**  
Ensures that the afterburner is up to 1400° F before the main burner is fired (required by some states). As smoke is generated, the afterburner will reach a maximum temperature of 1650° F. The Afterburner maintains exhaust

gasses at a temperature of 1400° – 1650° F for a minimum of ½ second of residence-time to eliminate any smoke and odor.

- **Cool Down Circuit:**

If the afterburner fails for any reason, the water sprays activate to cool the load to prevent smoke from going up the stack. The cool down circuit automatically shuts off when the furnace is below a specified temperature.

Quotation			
Qty.	Models & Options	Price	Total
1	PRC-340 Cleaning Furnace		
3	Additional 36" Chimney (for a 25' roofline)		
1	UL Listed Control Box (\$600.00 value)		
	FOB: Dallas, TX	Total	

**TERMS OF PAYMENT:**

- 30% w/Order, 60% before shipment, balance net 30
- Price valid for 60 days.
- Furnace will be shipped approximately 4-5 weeks from receipt of funds.

**CUSTOMER RESPONSIBILITY:**

- Receipt, uncrating and positioning of furnace;
- Compliance with furnace/vent stack installation, operation, and maintenance as outlined in the maintenance manual;
- Connect water and electricity;
- Connect fuel at appropriate pressure.

If you have any further questions, please do not hesitate to call.

Best Regards,

Pollution Control Products Co.

Robert Riggle  
Sales Department

PROPERTY OF  
TRACKER MARINE LLC

008985

ASSET  
8985

# BURN-OFF OVEN

MODEL

SERIAL #

VOLTAGE

FUEL

BTU

Manufactured under one or more of the following U.S. Patents:  
4,270,898; 4,557,203; 5,189,163. All rights reserved.

**POLLUTION  
CONTROL  
PRODUCTS CO.**

HEADQUARTERS

2677 Freewood Drive • Dallas, Texas 75229

Tel 214-358-1539 • Fax 214-358-1537

sales @ pollutioncontrol.com

Featuring:

Sales Offices in Maryland, Virginia, and Florida

# DANGER

DO NOT CLEAN ANY SEALED CONTAINER, PIPE, TANK, OR OTHER VESSEL CONTAINING ANY MATERIAL WHICH MAY EXPAND WHEN HEATED AND RUPTURE THE VESSEL. THIS INCLUDES WATER JACKETED STATORS, HEAT EXCHANGERS, COOLERS, OIL JACKETED PIPES, OR ANY OTHER SEALED VESSEL. PLUGS, CAPS, OR SEALS MUST BE REMOVED TO PREVENT EXPLOSIVE FORCES FROM RUPTURING THE VESSEL AND DESTROYING THE FURNACE.

POLLUTION CONTROL PRODUCTS CO. - DALLAS, TEXAS, U.S.A.

3610-12

# WARNING

DO NOT OPEN DOORS IF FURNACE TEMPERATURE IS ABOVE 300°F (150°C). DO NOT ATTEMPT TO RESTART.

*This Burn-Off Furnace is not an incinerator.*

Do not use the furnace to dispose of any bulk waste materials, medical or pathological or nuclear materials. Use it only to reclaim metal parts for salvage and/or reuse by removing conventional hydrocarbon coatings (paint/powder coatings, oil/grease coatings, plastics/polymer coatings) from metal parts.

Do not process waste paint, paint sludge, waste powder from powder coating operations, paint filters, waste plastic or polymer, nitrocellulose paints, solvents, thinners, PVC, lead or rubber-covered scrap wire or parts, wood, paper, trash, waste oil, waste grease, oil filters, ammunition, explosives, fertilizer or any combustible material which may overload the furnace and cause a fire or explosion.

Do not process oil-soaked transformers, epoxy-encapsulated coil-ends, or varnish drip pans/racks, spray-booth gratings, carts or any parts with uncured paint on them.

Do not use the furnace for curing or drying of varnished or painted parts or any parts that may contain volatile solvents.

Do not process coatings which may contain chlorine (PVC), fluorine (Teflon® Dupont Co.), sulfur or elements other than carbon, hydrogen and oxygen as they will form dangerous, toxic and corrosive acids.

Do not process any sealed vessels or parts made of magnesium or magnesium alloys.

Read instruction manual and all other signs on the furnace before operating. Follow instructions carefully. Consult factory with any questions.

**POLLUTION  
CONTROL  
PRODUCTS CO.**

Founded in 1971

Sales Offices in Major Cities Worldwide

FACTORY

2677 Freewood Drive

Dallas, Texas 75220

Tel 214-358-1539 Fax 214-358-3379

sales@pcpconline.com

3610-71

TM REG. U.S. PAT. OFFICE

## **APPENDIX H**

### **Form OP-F01 General Comments**

**FORM OP-F01 – GENERAL COMMENTS – SECTION F****F01.00 – GENERAL COMMENTS**

INSTALLATION NAME	FIPS	PLANT NO.	YEAR SUBMITTED
Tracker Marine - Lebanon Plant	105	0046	2014

**1. GENERAL INFORMATION**

Comments relating to the Forms:

Form OP-D01 - Existing Plant-Wide Conditions:

PW001 Emission Limitation: 2. Alternative Coatings - Paint booths EP-10(1) and EP-10(4) were removed.

PW001 Operational Limitations: 2. & 3. Particulate Matter - Paint booths EP-10(1) and EP-10(4) were removed.

Form OP-D03 - Emission Unit Information

This form is included for all emission units permitted under Permit to Construct #052013-001.

For EP-23, Make-up Air Units, only the two new units are shown. The two older units are natural gas-fired and 2.5 MMBTU/hr each.

Comments relating to Part 70 Operating Permit OP2010-119A (Project #2012-04-065):

I. Installation Description and Equipment Listing

Emission Units with Limitations

- EU0010 (EP-01) has been subdivided into:

EP-01A Gluing Operations (Fugitive - Assembly Line)

EP-01B Gluing Operations (HEPA Filter)

EP-13 Flotation Foaming

(per Application for Authority to Construct and Request for Modification to Emission point Designations dated 4/15/11).

Emission Units without Limitations

- Solvent Wipe-down emission units EP-03 and EP-03A have been discontinued.

- Space Heating, EP-05, has been discontinued.

- Drying Ovens EP-12[1], EP-12[2] and EP-12[4] have been removed.

- Gasoline Storage Tank, EP-06, has been subdivided into:

EP-06A Gasoline Storage Tank, Working Loss

EP-06B Gasoline Storage Tank, Breathing Loss

- Diesel Storage Tank, EP-07, has been subdivided into:

EP-07A Diesel Storage Tank, Working Loss

EP-07B Diesel Storage Tank, Breathing Loss

- Log Cutting, EP-09, has been renamed Plywood Cutting (Sawdust)

- Plasma Cutters EP-11(segs. 1, 2, 3, 4) - All have stacks and exhaust outdoors during warmer months. Therefore, core permit requirement 10 CSR 10-6.170 Restriction of Particulate Matter Beyond the Premises of Origin, and state requirement 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants apply to these units.

III. Emission Unit Specific Emission Limitations

Permit Condition EU0010-002 and (EU0020 through EU0050)-001

- Emission units EU0030 (Paint Booth #1, EP-10[1]), EU0035 (Paint Booth #2, EP-10[2]), EU0050 (Paint Booth #4, EP-10[4]), and EU0060 (Solvent Wipe Down, EP-10A[all segments]) have been removed.

Permit Condition EU0035-002 and EU0060-001

- Both emission units (EP-10(2), paint booth #2 and EP-10A(2), toluene wipedown) were removed.

Comments relating to Permit to Construct 052013-001

The proposed new emission unit designations for existing equipment as listed in Form 1.2 of the application have been restored to the former designations due to concern expressed by MDNR that historical continuity would be lost. Please see the updated emission unit designations in Attachment B.

Changes to Emission Units in the original application to construct:

Make-Up Air Units #1 and #2 have been grouped with the two existing Make-Up Air Units as EU-23.

Acid Wipedown, EU-27, has been discontinued and replaced by the Acid Wash System, EU-15.

"Acid Wash", EU-15, has been renamed "Acid Wash System."

**DUPLICATE THIS FORM AS NEEDED**



**FORM OP-F01 - GENERAL COMMENTS - SECTION F****F01.00 - GENERAL COMMENTS**

INSTALLATION NAME

Tracker Marine - Lebanon Plant

FIPS

105

PLANT NO.

0046

YEAR SUBMITTED

2014

**1. GENERAL INFORMATION**

Comments relating to 2013 Emissions Inventory Questionnaire

Emission Unit designations are current, including the following changes:

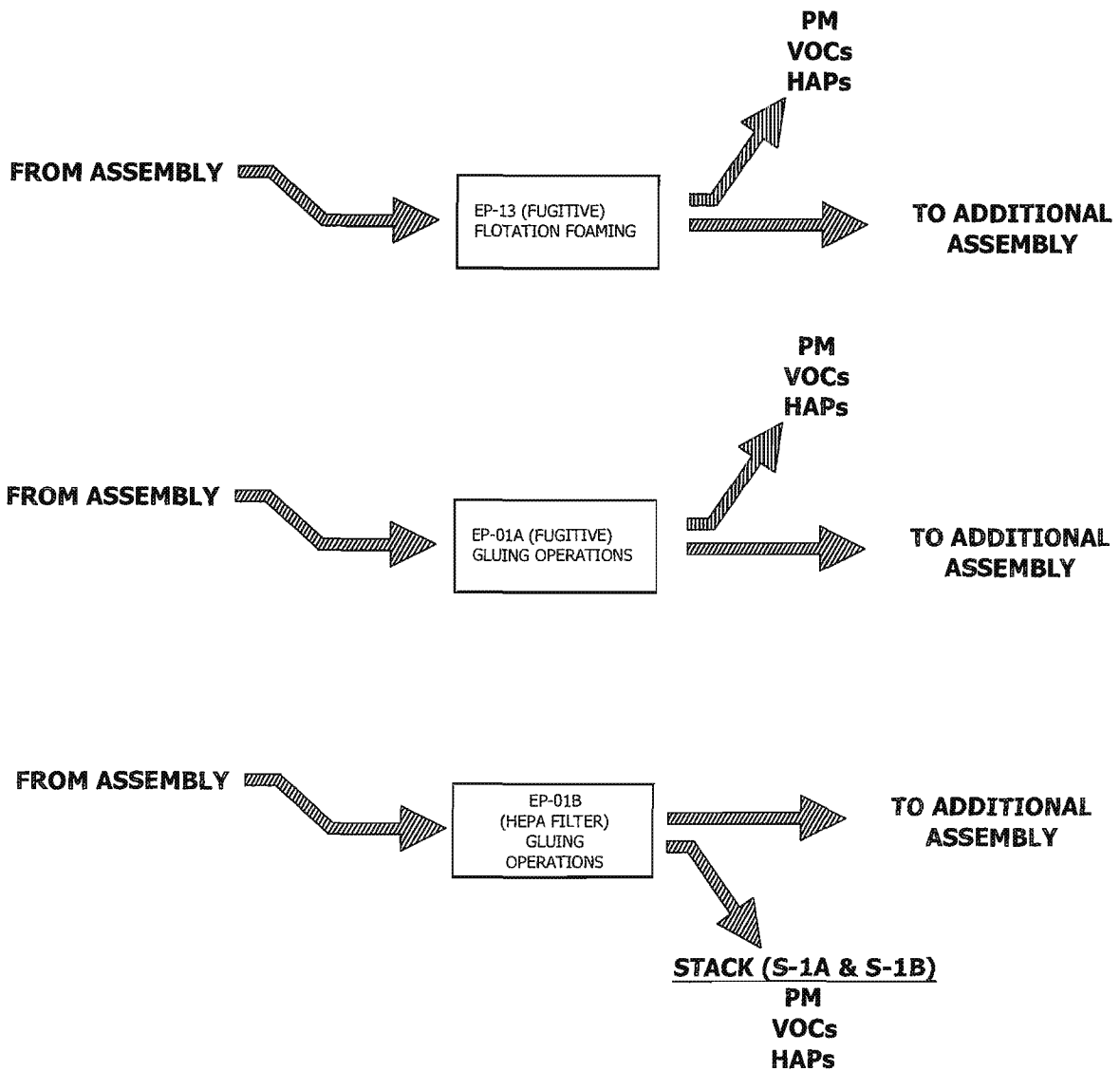
EP-23, Make-up Air Units, groups all four make-up air units at the facility.

EP-29, Toluene Cleaner, was added for toluene usage.

DUPLICATE THIS FORM AS NEEDED

**APPENDIX I**

**Process Flow Diagrams**



CHECKED BY:  
S. ROBORDS

E.W.I. # 130012  
DRAWN BY: MEK  
JUN. 19, 2014

NOT-TO-SCALE



1455 E. Chestnut Expressway  
Springfield, MO 65802

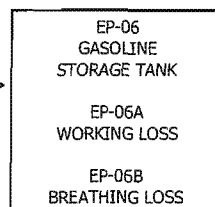
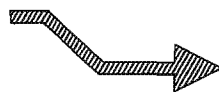
## PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

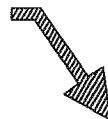
FIGURE

**1.1a**

**GASOLINE  
PURCHASED**

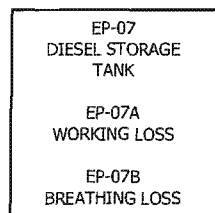
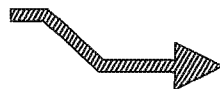


**GASOLINE  
USAGE**

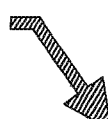


**VOCs  
HAPs**

**DIESEL  
PURCHASED**



**DIESEL  
USAGE**



**VOCs  
HAPs**

**NORTH**



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JUN. 19, 2014

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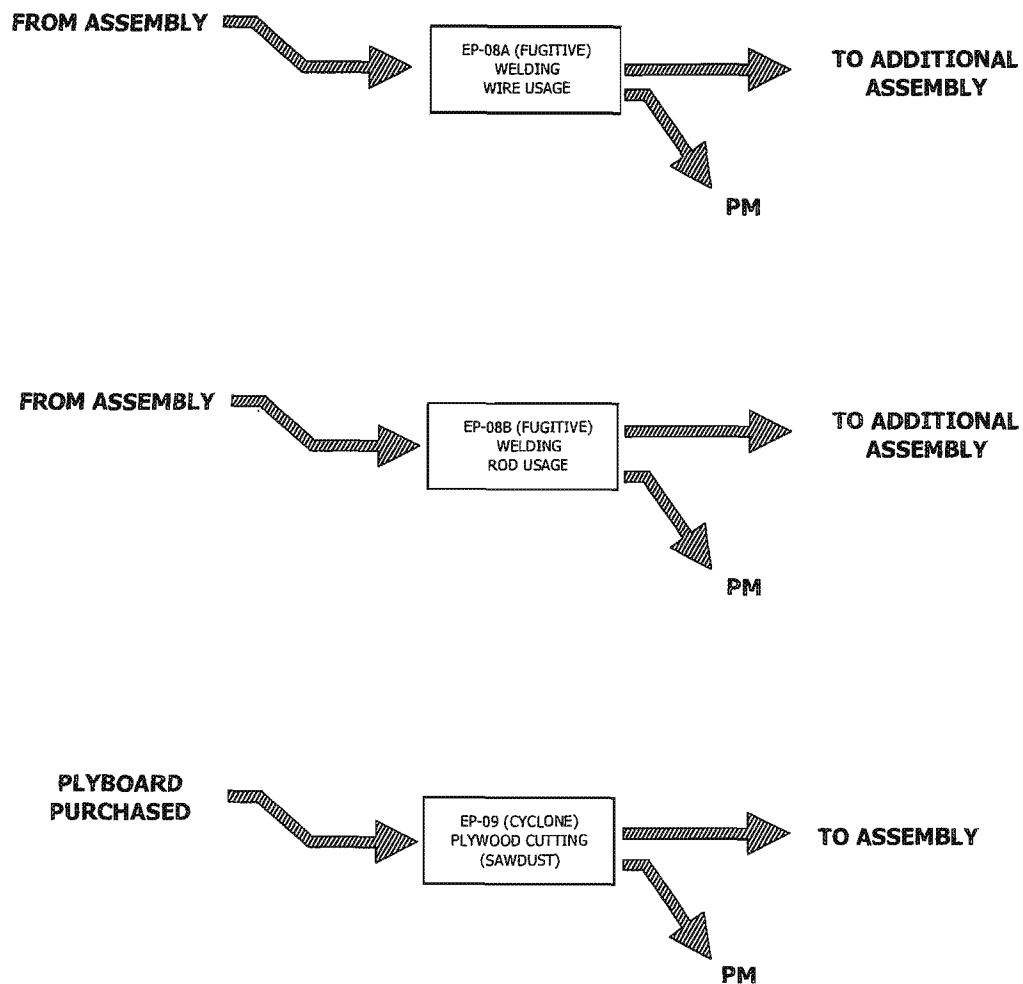
1455 E. Chestnut Expressway  
Springfield, MO 65802

**PROCESS FLOW DIAGRAM**

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

**FIGURE**

**1.1b**



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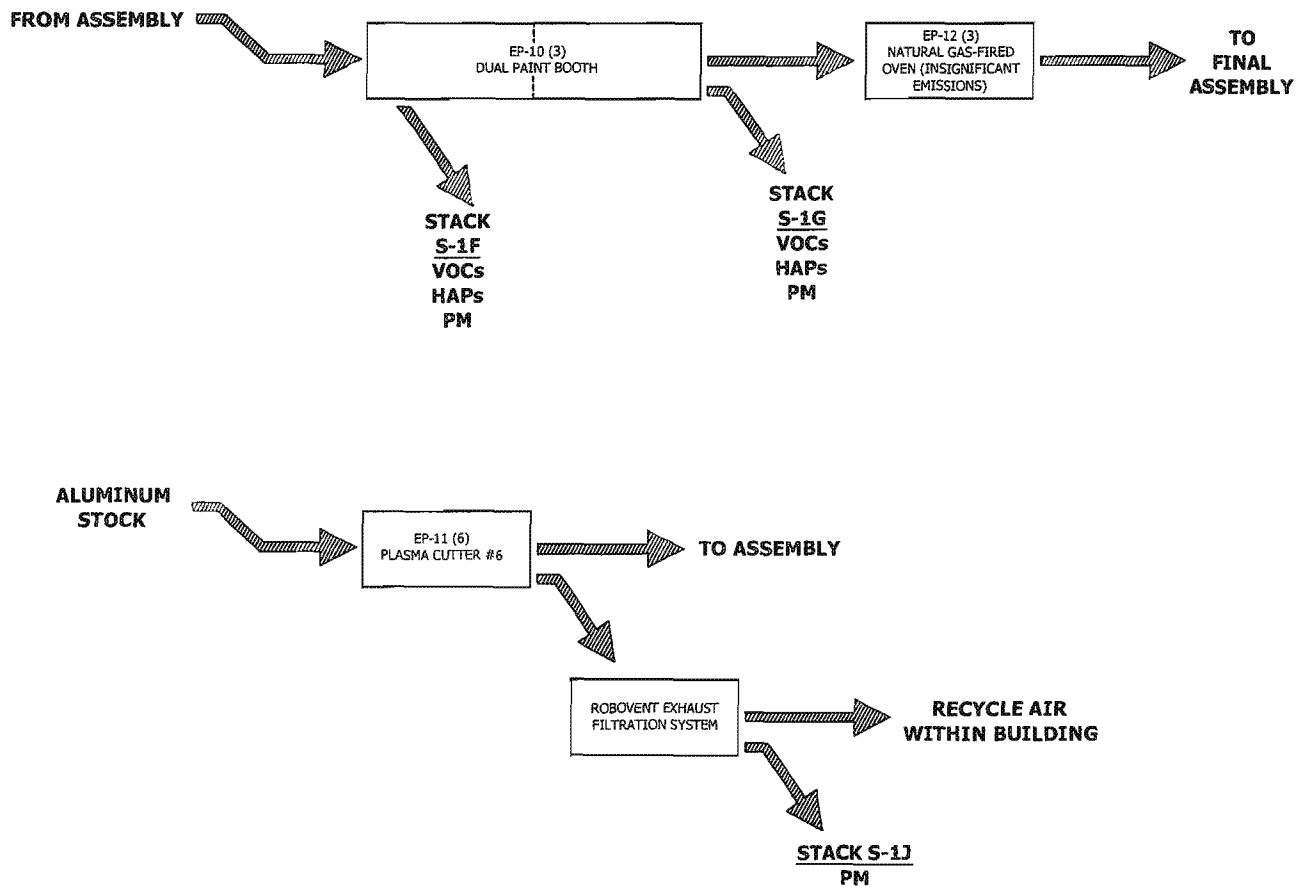
1455 E. Chestnut Expressway  
Springfield, MO 65802

## PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE

1.1c



NORTH



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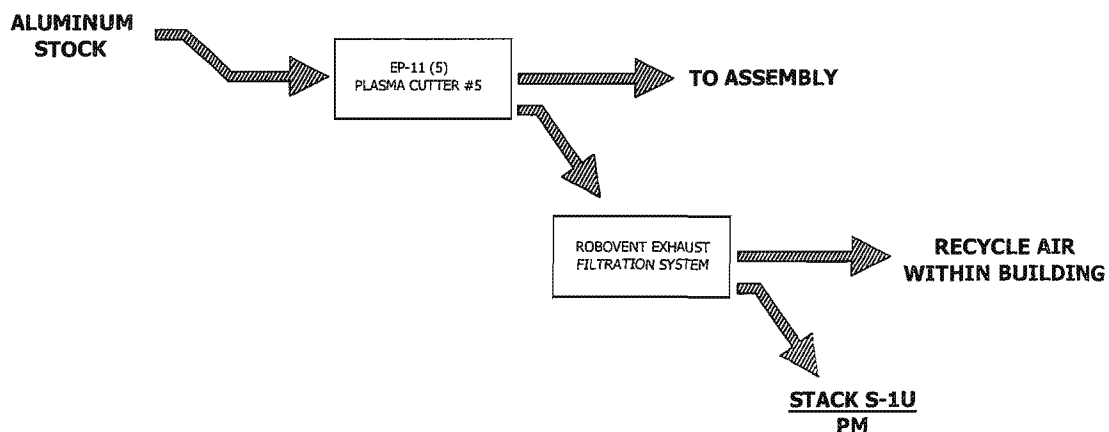
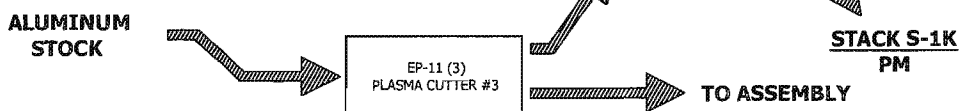
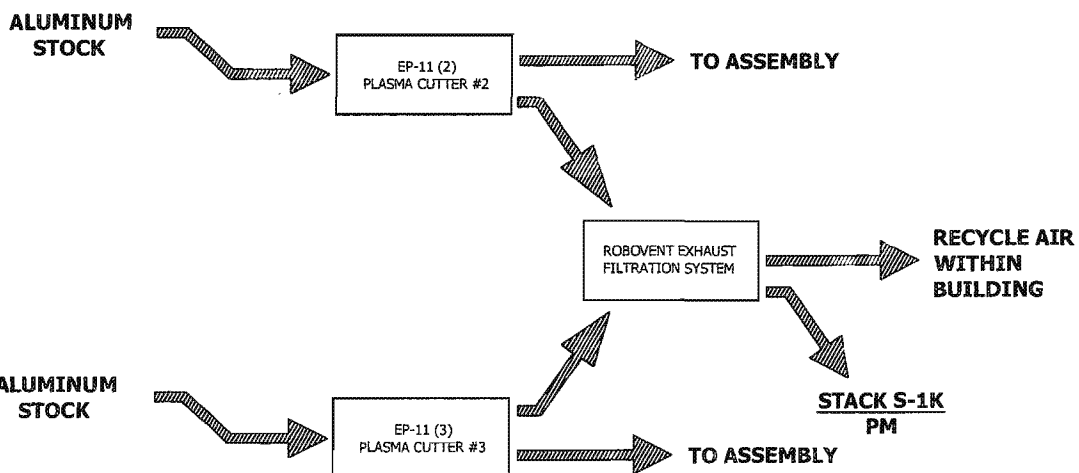
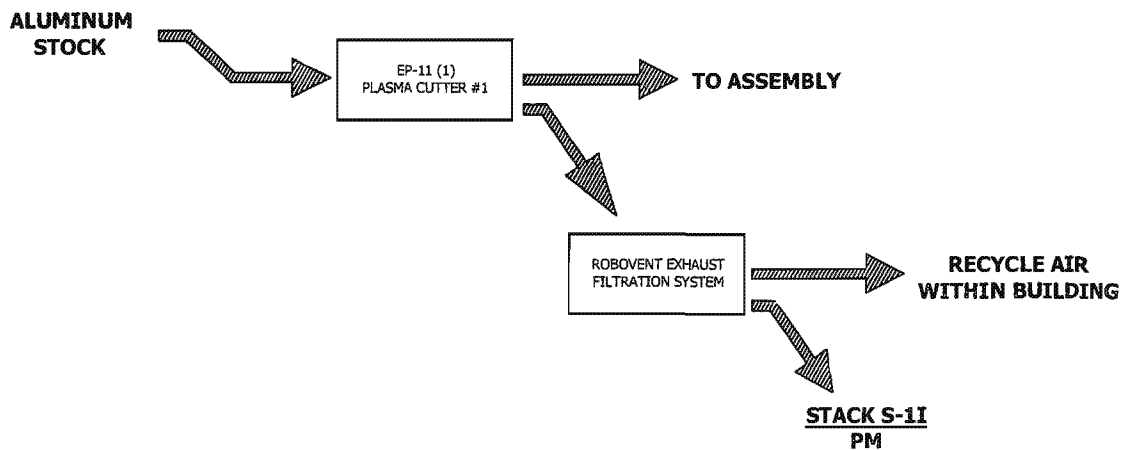
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Springfield, MO 65802

## PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #2  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE

1.1d



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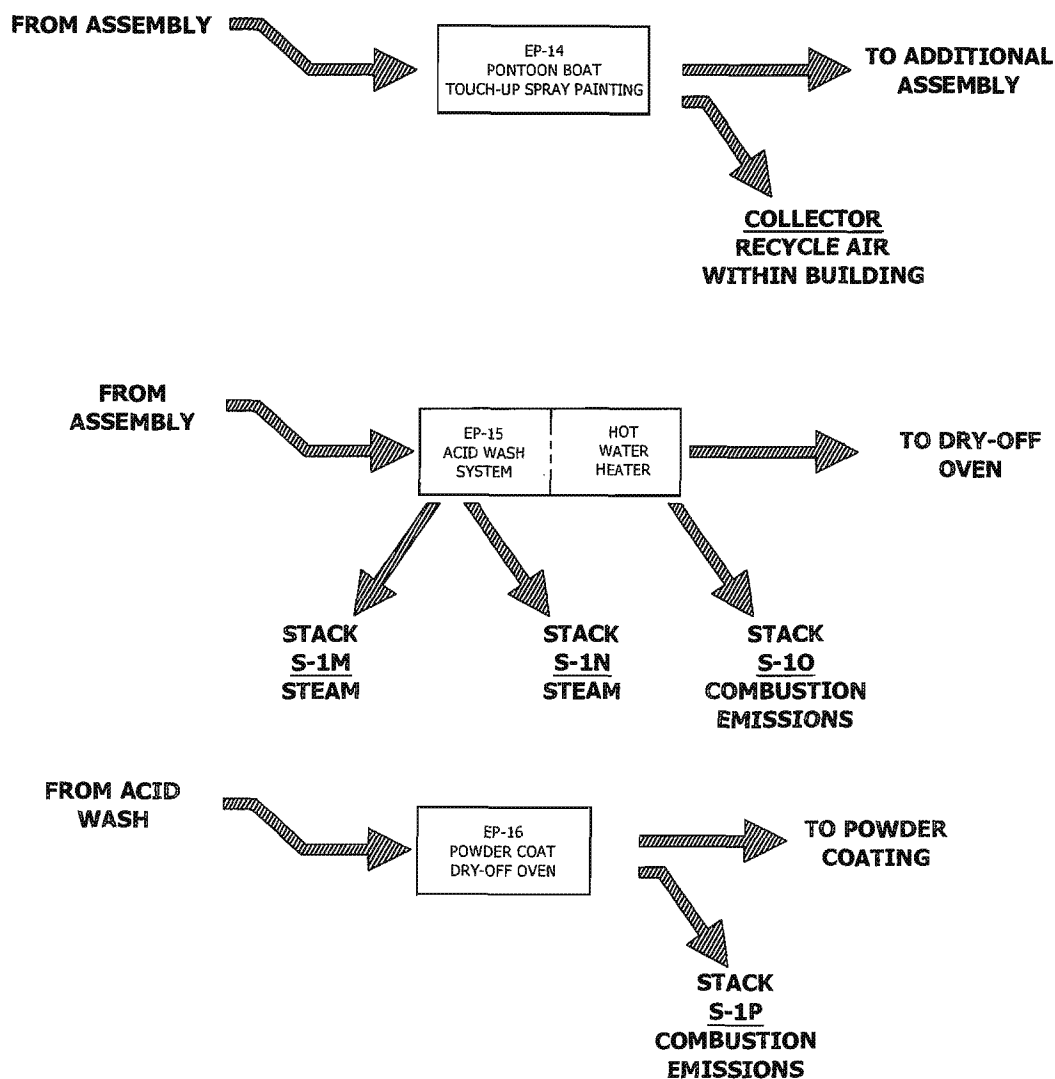
1455 E. Chestnut Expressway  
Springfield, MO 65802

## PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE

1.1e



NORTH



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JUN. 19, 2014

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PROCESS FLOW DIAGRAM

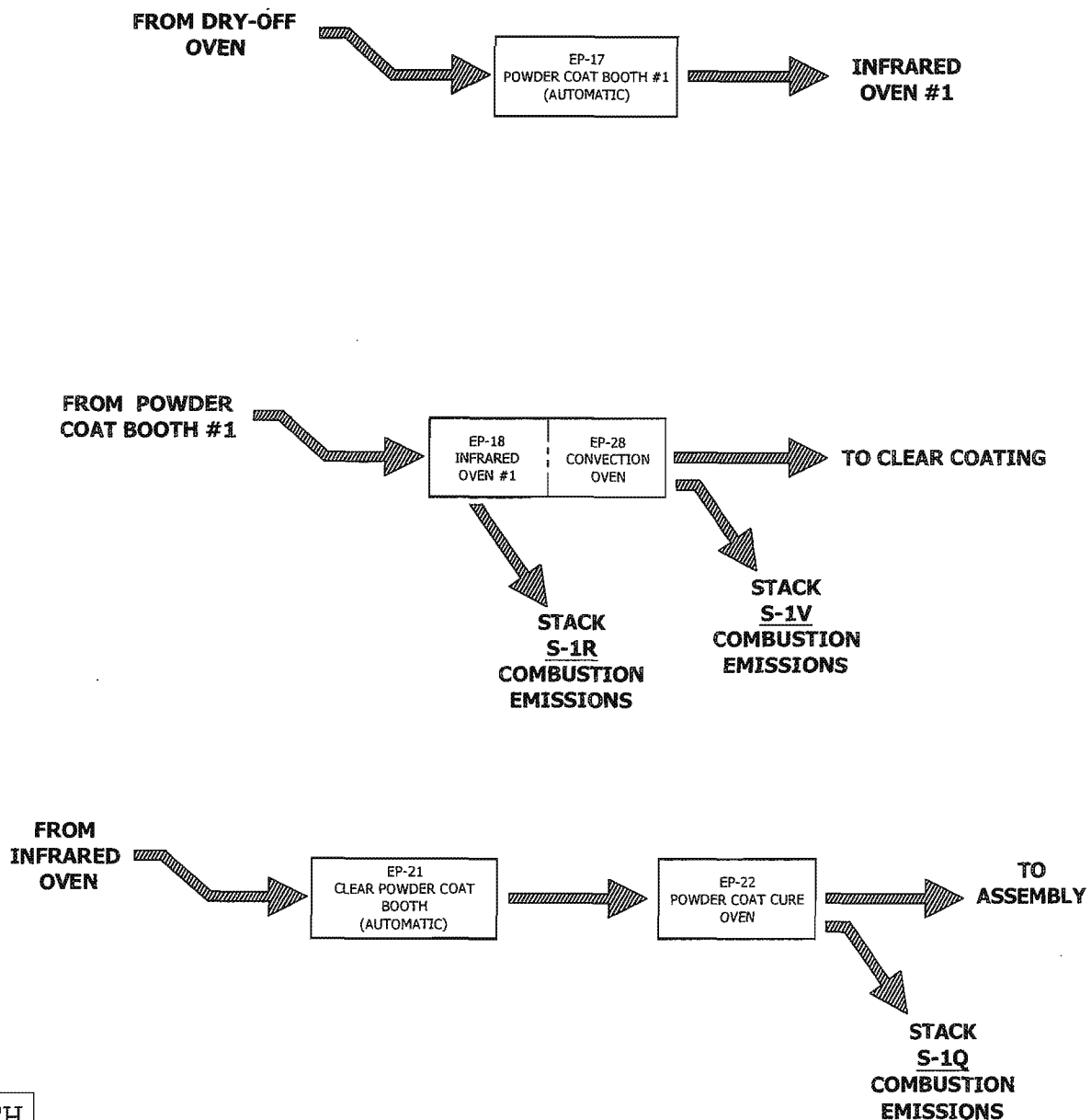
TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE

1.1f



# SINGLE COLOR BOATS



NORTH



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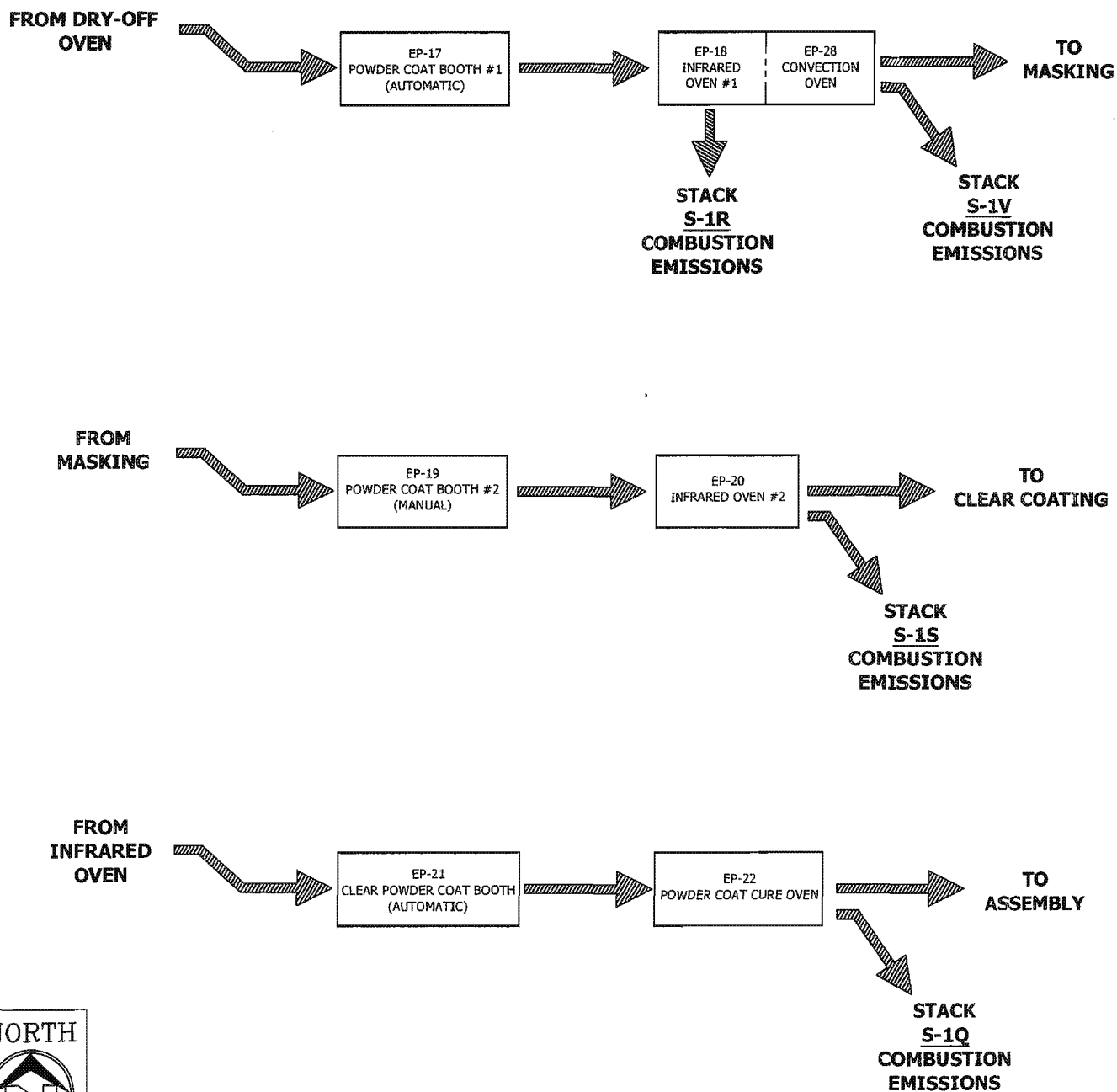
## PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE

1.1g

## TWO-TONED BOATS



NORTH



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S. ROBORDS

E.W.I. # 130012  
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JUN. 19, 2014

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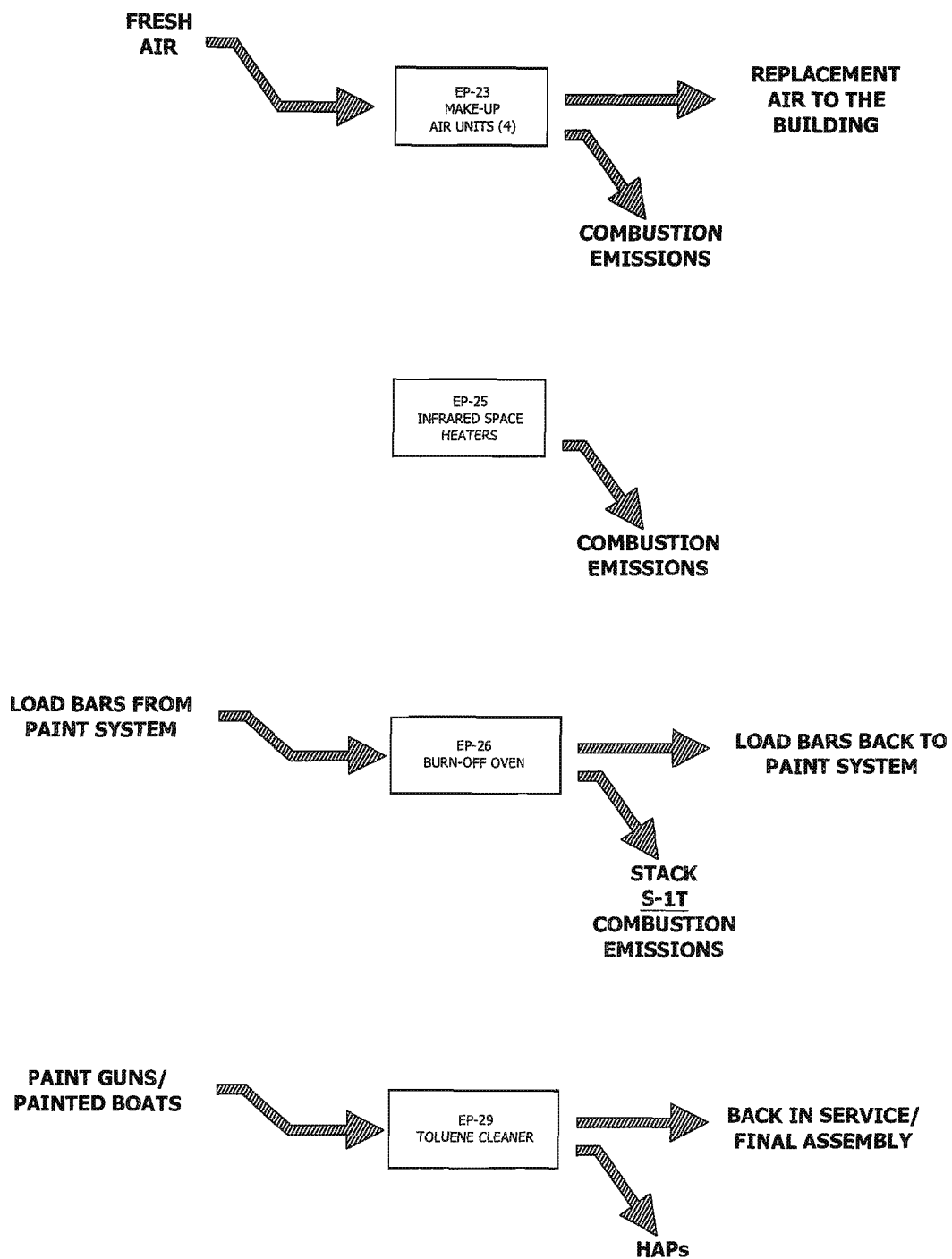
1455 E. Chestnut Expressway  
Springfield, MO 65802

### PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE

1.1h



NORTH



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S. ROBORDS

E.W.I. # 130012  
DRAWN BY: MEK  
JUN. 19, 2014

NOT-TO-SCALE



1455 E. Chestnut Expressway  
Springfield, MO 65802

## PROCESS FLOW DIAGRAM

TRACKER MARINE - LEBANON PLANT #1  
1500 MAPLE LANE  
LEBANON, MISSOURI

FIGURE

1.1i

**APPENDIX J**

**Safety Data Sheets**

# Material Safety Data Sheet



Date of Issue 18 October 2013

Version 9

## 1. Product and company identification

Product name : ULTRA VELOCITY CLEAR

Code : DC2000

Supplier : PPG Industries, Inc.  
One PPG Place,  
Pittsburgh, PA 15272

Emergency telephone : (412) 434-4515 (U.S.)  
number : (514) 645-1320 (Canada)  
01-800-00-21-400 (Mexico)

Technical Phone Number : 1-800-647-6050

## 2. Hazards identification

Emergency overview : WARNING!

FLAMMABLE LIQUID AND VAPOR. CAUSES RESPIRATORY TRACT IRRITATION. MAY BE HARMFUL IF INHALED OR SWALLOWED. MAY CAUSE EYE IRRITATION. PROLONGED OR REPEATED CONTACT MAY DRY SKIN AND CAUSE IRRITATION. CONTAINS MATERIAL THAT CAN CAUSE TARGET ORGAN DAMAGE.

Keep away from flames, such as a pilot light, and any object that sparks, such as an electric motor. Keep away from heat. Do not smoke. Do not swallow. Avoid breathing vapor or mist. Avoid contact with eyes, skin and clothing. Use only with adequate ventilation. Keep container tightly closed and sealed until ready for use. Wash thoroughly after handling.

### Potential acute health effects

Inhalation : May be harmful if inhaled. Irritating to respiratory system. Can irritate eyes, nose, mouth and throat. Exposure to decomposition products may cause a health hazard. Serious effects may be delayed following exposure.

Ingestion : May be harmful if swallowed.

Skin : Moderately irritating to the skin.

Eyes : Moderately irritating to eyes.

### Over-exposure signs/symptoms

Repeated exposure to high vapor concentrations may cause irritation of the respiratory system and permanent brain and nervous system damage. Inhalation of vapor/aerosol concentrations above the recommended exposure limits causes headaches, drowsiness and nausea and may lead to unconsciousness or death. There is some evidence that repeated exposure to organic solvent vapors in combination with constant loud noise can cause greater hearing loss than expected from exposure to noise alone.

Medical conditions : Pre-existing disorders involving any target organs mentioned in this MSDS as being at aggravated by over-exposure risk may be aggravated by over-exposure to this product.  
exposure

This Material Safety Data Sheet has been prepared in accordance with Canada's Workplace Hazardous Materials Information System (WHMIS) and the OSHA Hazard Communication Standard (29 CFR 1910.1200).

See toxicological information (Section 11)

## 6. Accidental release measures

- Environmental precautions** : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).
- Large spill** : Stop leak if without risk. Move containers from spill area. Approach release from upwind. Use spark-proof tools and explosion-proof equipment. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see Section 13). Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.
- Small spill** : Stop leak if without risk. Move containers from spill area. Use spark-proof tools and explosion-proof equipment. Dilute with water and mop up if water-soluble or absorb with an inert dry material and place in an appropriate waste disposal container. Dispose of via a licensed waste disposal contractor.

## 7. Handling and storage

- Handling** : Put on appropriate personal protective equipment (see Section 8). Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Do not swallow. Avoid breathing vapor or mist. Avoid contact with eyes, skin and clothing. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Do not enter storage areas and confined spaces unless adequately ventilated. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Store and use away from heat, sparks, open flame or any other ignition source. Use explosion-proof electrical (ventilating, lighting and material handling) equipment. Use non-sparking tools. Take precautionary measures against electrostatic discharges. Vapors are heavier than air and may spread along floors. To avoid fire or explosion, dissipate static electricity during transfer by grounding and bonding containers and equipment before transferring material. Empty containers retain product residue and can be hazardous. Do not reuse container. If this material is part of a multiple component system, read the Material Safety Data Sheet(s) for the other component or components before blending as the resulting mixture may have the hazards of all of its parts.
- Storage** : Store in accordance with local regulations. Store in a segregated and approved area. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10) and food and drink. Eliminate all ignition sources. Separate from oxidizing materials. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination. Do not store above the following temperature: 120F / 49C.

## 8. Exposure controls/personal protection

Name	Result	ACGIH	OSHA	Ontario	Mexico	IPEL
Acetone	TWA	500 ppm	1000 ppm	500 ppm	1000 ppm	Not established
	STEL	750 ppm	Not established	750 ppm	1260 ppm	Not established
n-butyl acetate	TWA	150 ppm	150 ppm	150 ppm	150 ppm	Not established
	STEL	200 ppm	Not established	200 ppm	200 ppm	Not established
heptan-2-one	TWA	50 ppm	100 ppm	25 ppm	50 ppm	Not

## Product name ULTRA VELOCITY CLEAR

**9. Physical and chemical properties**

Physical state	: Liquid.
Flash point	: Closed cup: -18.33°C (-0.99°F)
Explosion limits	: Lower: 2.1%
Material supports combustion.	: <input checked="" type="checkbox"/> es.
Color	: Not available.
Odor	: Not available.
pH	: Not available.
Boiling/condensation point	: >37.78°C (>100°F)
Melting/freezing point	: Not available.
Specific gravity	: 0.94
Density ( lbs / gal )	: 7.84
Vapor pressure	: 19.7 kPa (148 mm Hg) [room temperature]
Vapor density	: Not available.
Volatility	: 63% (v/v), 56.22% (w/w)
Evaporation rate	: 4.73 (butyl acetate = 1)
Partition coefficient: n-octanol/water	: Not available.
% Solid. (w/w)	: 43.78

**10. Stability and reactivity**

Stability	: Stable under recommended storage and handling conditions (see Section 7).
Conditions to avoid	: Avoid all possible sources of ignition (spark or flame). Do not pressurize, cut, weld, braze, solder, drill, grind or expose containers to heat or sources of ignition.
Materials to avoid	: Reactive or incompatible with the following materials: oxidizing materials, strong acids, strong alkalis
Hazardous decomposition products	: Under normal conditions of storage and use, hazardous decomposition products should not be produced.
Hazardous polymerization	: Under normal conditions of storage and use, hazardous polymerization will not occur.

**11. Toxicological information**Acute toxicity

Product/ingredient name	Result	Species	Dose	Exposure
<input checked="" type="checkbox"/> Acetone	LD50 Oral	Rat	1.8 g/kg	-
	LD50 Dermal	Rabbit	20 g/kg	-
	LC50 Inhalation Vapor	Rat	76000 mg/m3	4 hours
n-butyl acetate	LD50 Oral	Rat	10.768 g/kg	-
	LD50 Dermal	Rabbit	>17600 mg/kg	-
	LC50 Inhalation	Rat	>21.1 mg/l	4 hours
n-butyl propionate	LD50 Oral	Rat	>5000 mg/kg	-
	LD50 Dermal	Rabbit	>14 g/kg	-
heptan-2-one	LD50 Oral	Rat	1.6 g/kg	-
	LD50 Dermal	Rabbit	10.206 g/kg	-
2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol	LD50 Oral	Rat	>2000 mg/kg	-
	LD50 Dermal	Rabbit	>2000 mg/kg	-

Conclusion/Summary : Not available.

Chronic toxicity

Conclusion/Summary : Not available.

Product code **DC2000**Date of issue **18 October 2013** Version **9**Product name **ULTRA VELOCITY CLEAR****13. Disposal considerations**

Refer to Section 7: HANDLING AND STORAGE and Section 8: EXPOSURE CONTROLS/PERSONAL PROTECTION for additional handling information and protection of employees. Section 6. Accidental release measures

**14. Transport information**

Regulation	UN number	Proper shipping name	Classes	PG*	Additional information
UN	1263	PAINT	3	II	-
IMDG	1263	PAINT	3	II	-
DOT	1263	PAINT	3	II	<b>Reportable quantity</b> 23906.4 lbs / 10853.5 kg [3050.1 gal / 11545.8 L] Package sizes shipped in quantities less than the product reportable quantity are not subject to the RQ (reportable quantity) transportation requirements.

PG\* : Packing group

Reportable quantity RQ : CERCLA: Hazardous substances. propionic acid: 5000 lbs. (2270 kg); n-butyl acetate: 5000 lbs. (2270 kg); acetone: 5000 lbs. (2270 kg);

**15. Regulatory information**

**United States inventory (TSCA 8b)** : All components are listed or exempted.

**Australia inventory (AICS)** : At least one component is not listed.

**Canada inventory (DSL)** : All components are listed or exempted.

**China inventory (IECSC)** : All components are listed or exempted.

**Europe inventory (REACH)** : Please contact your supplier for information on the inventory status of this material.

**Japan inventory (ENCS)** : At least one component is not listed.

**Korea inventory (KECI)** : At least one component is not listed.

**New Zealand (NZIoC)** : At least one component is not listed.

**Philippines inventory (PICCS)** : At least one component is not listed.

**United States**

**SARA 302/304**: No products were found.

CERCLA: Hazardous substances.: propionic acid: 5000 lbs. (2270 kg); n-butyl acetate: 5000 lbs. (2270 kg); acetone: 5000 lbs. (2270 kg);

SARA 311/312 SDS Distribution - Chemical inventory - Hazard Identification:

Chemical name	CAS #	Acute	Chronic	Fire	Reactive	Pressure
Acetone	67-64-1	Y	N	Y	N	N
n-butyl acetate	123-86-4	Y	N	Y	N	N
n-butyl propionate	590-01-2	Y	N	Y	N	N
heptan-2-one	110-43-0	Y	N	Y	N	N
2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol	25973-55-1	N	N	N	N	N
Product as-supplied :		Y	N	Y	N	N

Additional environmental information is contained on the Environmental Data Sheet for this product, which can be obtained from your PPG representative.

**Canada**



# Material Safety Data Sheet



Date of issue 29 December 2013  
Version 6

## 1. Product and company identification

Product name : Basecoat  
Code : MBC-1  
Supplier : PPG Industries, Inc.  
One PPG Place,  
Pittsburgh, PA 15272  
Emergency telephone number : (412) 434-4515 (U.S.)  
(514) 645-1320 (Canada)  
01-800-00-21-400 (Mexico)  
Technical Phone Number : (740) 363-9610 (DELAWARE, OH) 8:00 a.m. - 5:00 p.m. EST

## 2. Hazards identification

Emergency overview : DANGER!

**FLAMMABLE LIQUID AND VAPOR. CAUSES RESPIRATORY TRACT, EYE AND SKIN IRRITATION. MAY BE HARMFUL IF INHALED, ABSORBED THROUGH SKIN OR SWALLOWED. SANDING AND GRINDING DUSTS MAY BE HARMFUL IF INHALED. ASPIRATION HAZARD. CAN ENTER LUNGS AND CAUSE DAMAGE. PROLONGED OR REPEATED CONTACT MAY DRY SKIN AND CAUSE IRRITATION. CONTAINS MATERIAL THAT CAN CAUSE TARGET ORGAN DAMAGE. Add this product only to water. Never add water to this product.**

Keep away from flames, such as a pilot light, and any object that sparks, such as an electric motor. Keep away from heat. Do not smoke. Do not swallow. Do not get in eyes or on skin or clothing. Avoid breathing vapor or mist. Use only with adequate ventilation. Keep container tightly closed and sealed until ready for use. Wash thoroughly after handling.

### Potential acute health effects

**Inhalation** : May be harmful if inhaled. Irritating to respiratory system. Can irritate eyes, nose, mouth and throat. Exposure to decomposition products may cause a health hazard. Serious effects may be delayed following exposure.  
**Ingestion** : May be harmful if swallowed. Aspiration hazard if swallowed. Can enter lungs and cause damage.  
**Skin** : Harmful in contact with skin. Irritating to skin.  
**Eyes** : Severely irritating to eyes. Risk of serious damage to eyes.

### Over-exposure signs/symptoms

Repeated exposure to high vapor concentrations may cause irritation of the respiratory system and permanent brain and nervous system damage. Inhalation of vapor/aerosol concentrations above the recommended exposure limits causes headaches, drowsiness and nausea and may lead to unconsciousness or death. There is some evidence that repeated exposure to organic solvent vapors in combination with constant loud noise can cause greater hearing loss than expected from exposure to noise alone.

**Medical conditions aggravated by over-exposure** : Pre-existing disorders involving any target organs mentioned in this MSDS as being at risk may be aggravated by over-exposure to this product.

This Material Safety Data Sheet has been prepared in accordance with Canada's Workplace Hazardous Materials Information System (WHMIS) and the OSHA Hazard Communication Standard (29 CFR 1910.1200).

See toxicological information (Section 11)

Product code **MBC-1**

Date of issue **29 December 2013 Version 6**

Product name **Basecoat**

## 5 . Fire-fighting measures

**Flammability of the product** : Flammable liquid. In a fire or if heated, a pressure increase will occur and the container may burst, with the risk of a subsequent explosion. Vapors may accumulate in low or confined areas or travel a considerable distance to a source of ignition and flash back. Runoff to sewer may create fire or explosion hazard.

### Extinguishing media

**Suitable** : Use dry chemical, CO<sub>2</sub>, water spray (fog) or foam.

**Not suitable** : Do not use water jet.

**Special exposure hazards** : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training. Move containers from fire area if this can be done without risk. Use water spray to keep fire-exposed containers cool.

**Hazardous combustion products** : Decomposition products may include the following materials:  
carbon oxides  
nitrogen oxides  
sulfur oxides  
halogenated compounds  
metal oxide/oxides

**Special protective equipment for fire-fighters** : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

## 6 . Accidental release measures

**Personal precautions** : No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Shut off all ignition sources. No flares, smoking or flames in hazard area. Do not breathe vapor or mist. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment (see Section 8).

**Environmental precautions** : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

**Large spill** : Stop leak if without risk. Move containers from spill area. Approach release from upwind. Use spark-proof tools and explosion-proof equipment. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see Section 13). Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

**Small spill** : Stop leak if without risk. Move containers from spill area. Use spark-proof tools and explosion-proof equipment. Dilute with water and mop up if water-soluble or absorb with an inert dry material and place in an appropriate waste disposal container. Dispose of via a licensed waste disposal contractor.

## 7 . Handling and storage

**Handling** : Materials such as cleaning rags, paper wipes and protective clothing, which are contaminated with the product may spontaneously self-ignite. To avoid the risks of fires, all contaminated materials should be placed in a metal container filled with water and sealed. Contaminated materials should be removed from the workplace at the end of each working day and be stored outside. Put on appropriate personal protective equipment (see Section 8). Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Do not breathe vapor or mist. Do not swallow. Do not get in eyes or on skin or clothing. Use only with adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Do not enter storage areas and confined spaces unless adequately ventilated. Keep in the original container or an approved alternative made from a compatible material, kept tightly

Product code **MBC-1**Date of issue **29 December 2013 Version 6**Product name **Basecoat****8 . Exposure controls/personal protection**

						established
toluene	TWA	20 ppm	200 ppm Z	20 ppm	50 ppm S	Not established
	STEL	Not established	500 ppm Z A 300 ppm Z C	Not established	Not established	Not established
Aluminium powder (stabilized)	TWA	1 mg/m <sup>3</sup> R	15 mg/m <sup>3</sup> (as Al) TD 5 mg/m <sup>3</sup> (as Al) R	1 mg/m <sup>3</sup> R	5 mg/m <sup>3</sup> 5 mg/m <sup>3</sup>	Not established
m-xylene	TWA	100 ppm	100 ppm	100 ppm	100 ppm	Not established
	STEL	150 ppm	Not established	150 ppm	150 ppm	Not established
tin dioxide	TWA	2 mg/m <sup>3</sup> (as Sn)	2 mg/m <sup>3</sup> TD 2 mg/m <sup>3</sup>	2 mg/m <sup>3</sup> (as Sn)	2 mg/m <sup>3</sup> (as Sn)	Not established
	STEL	Not established	Not established	Not established	4 mg/m <sup>3</sup> (as Sn)	Not established
zirconium dioxide	TWA	5 mg/m <sup>3</sup> (as Zr)	5 mg/m <sup>3</sup> (as Zr) 5 mg/m <sup>3</sup> (as Zr)	5 mg/m <sup>3</sup> (as Zr)	5 mg/m <sup>3</sup> (as Zr)	Not established
	STEL	10 mg/m <sup>3</sup> (as Zr)	10 mg/m <sup>3</sup> (as Zr)	10 mg/m <sup>3</sup> (as Zr)	10 mg/m <sup>3</sup> (as Zr)	Not established
4-methylpentan-2-one	TWA	20 ppm	100 ppm	50 ppm	50 ppm	Not established
	STEL	75 ppm	Not established	75 ppm	75 ppm	Not established
butanone	TWA	200 ppm	200 ppm	200 ppm	200 ppm	Not established
	STEL	300 ppm	Not established	300 ppm	300 ppm	Not established
carbon black respirable	TWA	3 mg/m <sup>3</sup>	3.5 mg/m <sup>3</sup>	3 mg/m <sup>3</sup>	3.5 mg/m <sup>3</sup>	Not established
	STEL	Not established	Not established	Not established	7 mg/m <sup>3</sup>	Not established
Stoddard solvent	TWA	100 ppm	500 ppm	100 ppm	100 ppm	Not established
	STEL	Not established	Not established	Not established	200 ppm	Not established
Solvent naphtha (petroleum), light aromatic	TWA	Not established	Not established	5 mg/m <sup>3</sup>	5 mg/m <sup>3</sup>	Not established
	STEL	Not established	Not established	10 mg/m <sup>3</sup>	10 mg/m <sup>3</sup>	Not established
Silica, amorphous, fumed, cryst.-free	TWA	Not established	Not established	Not established	10 mg/m <sup>3</sup> 3 mg/m <sup>3</sup> R	Not established
p-xylene	TWA	100 ppm	100 ppm	434 mg/m <sup>3</sup>	100 ppm	Not established
	STEL	150 ppm	Not	150 ppm	150 ppm	Not

Product code **MBC-1**

Date of issue **29 December 2013 Version 6**

Product name **Basecoat**

## 8 . Exposure controls/personal protection

### Skin

: Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.  
When there is a risk of ignition from static electricity, wear anti-static protective clothing. For the greatest protection from static discharges, clothing should include anti-static overalls, boots and gloves.

### Environmental exposure controls

: Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

## 9 . Physical and chemical properties

Physical state	: Liquid.
Flash point	: Closed cup: 10°C (50°F)
Color	: Not available.
Odor	: Not available.
pH	: Not available.
Boiling/condensation point	: >37.78°C (>100°F)
Melting/freezing point	: Not available.
Specific gravity	: 0.96
Density ( lbs / gal )	: 8.01
Vapor pressure	: Not available.
Vapor density	: Not available.
Volatility	: 77% (v/v), 69% (w/w)
Evaporation rate	: Not available.
Partition coefficient: n-octanol/water	: Not available.
% Solid. (w/w)	: 30.96

Physical property values shown in this section are calculated averages. For specific product information, contact your PPG Sales Representative.

## 10 . Stability and reactivity

Stability	: Stable under recommended storage and handling conditions (see Section 7).
Conditions to avoid	: Avoid all possible sources of ignition (spark or flame). Do not pressurize, cut, weld, braze, solder, drill, grind or expose containers to heat or sources of ignition.
Materials to avoid	: Reactive or incompatible with the following materials: water, acids, oxidizing materials, strong alkalis
Hazardous decomposition products	: Under normal conditions of storage and use, hazardous decomposition products should not be produced.
Hazardous polymerization	: Under normal conditions of storage and use, hazardous polymerization will not occur.

## 11 . Toxicological information

### Acute toxicity

Product/ingredient name	Result	Species	Dose	Exposure
Xylene	LD50 Oral	Rat	4.3 g/kg	-
	LD50 Dermal	Rabbit	>1.7 g/kg	-
	LC50 Inhalation Vapor	Rat	5000 ppm	4 hours
n-butyl acetate	LD50 Oral	Rat	10.768 g/kg	-
	LD50 Dermal	Rabbit	>17600 mg/kg	-
	LC50 Inhalation	Rat	>21.1 mg/l	4 hours
titanium dioxide	LD50 Oral	Rat	>10 g/kg	-

Product code **MBC-1**Date of issue **29 December 2013 Version 6**Product name **Basecoat****11. Toxicological information**

Product/ingredient name	ACGIH	IARC	NTP	OSHA
Xylene	A4	3	-	-
titanium dioxide	A4	2B	-	-
ethylbenzene	A3	2B	-	-
diliron trioxide	A4	3	-	-
toluene	A4	3	-	-
Aluminium powder (stabilized)	A4	-	-	-
m-xylene	A4	3	-	-
zirconium dioxide	A4	-	-	-
4-methylpentan-2-one	A3	2B	-	-
carbon black respirable	A3	2B	-	-
Silica, amorphous, fumed, cryst.-free	-	3	-	-
p-xylene	A4	3	-	-

Carcinogen Classification code: ACGIH: A1, A2, A3, A4, A5  
IARC: 1, 2A, 2B, 3, 4  
NTP: Proven, Possible  
OSHA: +  
Not listed or regulated as a carcinogen: -

**Teratogenicity**

**Teratogenicity** : Contains material which may cause birth defects, based on animal data.

**Developmental effects** : Contains material which may cause developmental abnormalities, based on animal data.

**Fertility effects** : Contains material which may impair female fertility, based on animal data.

**12. Ecological information**

**Environmental effects** : No known significant effects or critical hazards.

**Aquatic ecotoxicity**

Product/ingredient name	Result	Species	Exposure
Xylene	Acute LC50 3300 to 4093 ug/L Fresh water	Fish - Rainbow trout, donaldson trout - Oncorhynchus mykiss	96 hours
n-butyl acetate	Acute LC50 18000 to 19000 ug/L Fresh water	Fish - Fathead minnow - Pimephales promelas	96 hours
heptan-2-one	Acute LC50 131000 to 137000 ug/L Fresh water	Fish - Fathead minnow - Pimephales promelas	96 hours
ethylbenzene	Acute LC50 4200 ug/L Fresh water	Fish - Rainbow trout, donaldson trout - Oncorhynchus mykiss	96 hours
	Acute LC50 5100 to 5700 ug/L Marine water	Fish - Atlantic silverside - Menidia menidia	96 hours
	Acute EC50 2930 to 4400 ug/L Fresh water	Daphnia - Water flea - Daphnia magna	48 hours
	Chronic NOEC 3300 ug/L Marine water	Fish - Atlantic silverside - Menidia menidia	96 hours
	Chronic NOEC 6800 ug/L Fresh water	Daphnia - Water flea - Daphnia magna	48 hours
butan-1-ol	Acute LC50 100 to 500 mg/L Fresh water	Fish - Bluegill - Lepomis macrochirus	96 hours
	Acute EC50 1983000 to 2072000 ug/L	Daphnia - Water flea - Daphnia	48 hours

Product code **MBC-1**Date of issue **29 December 2013 Version 6**Product name **Basecoat****13. Disposal considerations**

explosive atmosphere inside the container. Do not cut, weld or grind used containers unless they have been cleaned thoroughly internally. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

Disposal should be in accordance with applicable regional, national and local laws and regulations.

Refer to Section 7: HANDLING AND STORAGE and Section 8: EXPOSURE CONTROLS/PERSONAL PROTECTION for additional handling information and protection of employees. Section 6. Accidental release measures

**14. Transport information**

	DOT	TDG	Mexico	IMDG
UN number	<input checked="" type="checkbox"/> N1263	<input checked="" type="checkbox"/> N1263	<input checked="" type="checkbox"/> N1263	<input checked="" type="checkbox"/> N1263
UN proper shipping name	<input checked="" type="checkbox"/> AINT	<input checked="" type="checkbox"/> AINT	<input checked="" type="checkbox"/> AINT	<input checked="" type="checkbox"/> AINT
Transport hazard class(es)	3	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Packing group	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Environmental hazards	<input checked="" type="checkbox"/> No.	<input checked="" type="checkbox"/> No.	<input checked="" type="checkbox"/> No.	<input checked="" type="checkbox"/> No.
Marine pollutant substances	<input checked="" type="checkbox"/> Not applicable.	<input checked="" type="checkbox"/> Not applicable.	Not applicable.	<input checked="" type="checkbox"/> Not applicable.
Product RQ (lbs)	<input checked="" type="checkbox"/> 03.52	Not applicable.	Not applicable.	Not applicable.
RQ substances	<input checked="" type="checkbox"/> Xylene, ethylbenzene)	Not applicable.	Not applicable.	Not applicable.

**Additional information**

DOT : ☒Package sizes shipped in quantities less than the product reportable quantity are not subject to the RQ (reportable quantity) transportation requirements.

TDG : ☒None identified.

Mexico : ☒None identified.

IMDG : ☒None identified.

Special precautions for user : ☒Transport within user's premises: always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.

**15. Regulatory information**

United States inventory (TSCA 8b) : All components are listed or exempted.

Australia inventory (AICS) : At least one component is not listed.

Canada inventory (DSL) : At least one component is not listed. Unlisted component(s) have been notified and volumes are being tracked.

China inventory (IECSC) : At least one component is not listed.

Europe inventory (REACH) : Please contact your supplier for information on the inventory status of this material.

Japan inventory (ENCS) : Not determined.

Korea inventory (KECI) : At least one component is not listed.

New Zealand (NZIoC) : Not determined.

Philippines inventory (PICCS) : At least one component is not listed.

**United States**

☒ARA 302/304: Hydrogen chloride

Product code **MBC-1**

Date of issue **29 December 2013 Version 6**

Product name **Basecoat**

## 15. Regulatory information

**WARNING:** This product contains a chemical known to the State of California to cause cancer and birth defects or other reproductive harm.

### Canada

**WHMIS (Canada)** : Class B-2: Flammable liquid with a flash point lower than 37.8°C (100°F). Class D-2A: Material causing other toxic effects (Very toxic). Class D-2B: Material causing other toxic effects (Toxic).

### Mexico

#### **Classification**

**Flammability : 3    Health : 3    Reactivity : 0**

## 16. Other information

### **Hazardous Material Information System (U.S.A.)**

**Health : 3    \*    Flammability : 3    Physical hazards : 0**

**(\*) - Chronic effects**

**Caution:** HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings are not required on MSDSs under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered mark of the National Paint & Coatings Association (NPCA). HMIS® materials may be purchased exclusively from J. J. Keller (800) 327-6868.

**The customer is responsible for determining the PPE code for this material.**

### **National Fire Protection Association (U.S.A.)**

**Health : 3    Flammability : 3    Instability : 0**

**Date of previous issue : 9/30/2012.**

**Organization that prepared the MSDS : EHS**

☒ **Indicates information that has changed from previously issued version.**

### Disclaimer

*The information contained in this data sheet is based on present scientific and technical knowledge. The purpose of this information is to draw attention to the health and safety aspects concerning the products supplied by PPG, and to recommend precautionary measures for the storage and handling of the products. No warranty or guarantee is given in respect of the properties of the products. No liability can be accepted for any failure to observe the precautionary measures described in this data sheet or for any misuse of the products.*